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ABSTRACT

This document summarizes the responses from members of the public throughout the 50 states, District of Columbia, and Puerto Rico to a September 1994 notice in the Federal Register in which the Secretary of Education invited public comments regarding reauthorization of programs under the Perkins Act, Adult Education Act, and National Literacy Act of 1991. The following are among the topics covered: general issues in restructuring vocational education (VE) and adult education (AE) programs to achieve national education goals (promoting world-class standards for all students; linking VE and AE to broader objectives for achieving educational reform; and connecting VE, AE, and the School-to-Work Opportunities Act); crosscutting program issues (program standards/assessment, distribution of funds, corrections education, state plans/responsibilities, professional development, and data collection); issues related to VE programs and reauthorization of the Perkins Act (basic state grants, applied technical programs, tech prep, VE and occupational information data systems, and unfunded authorities); and issues related to individual AE programs and reauthorization of the Adult Education Act (state programs and state literacy resource centers). Appended are 16 supplementary tables of data about respondents and distributions of responses regarding major issue categories/subcategories by state and the notice published in the Federal Register. (MN)

ED 379 451

Summary Of Public Comments Regarding the Reauthorization Of Vocational and Adult Education Programs

Final Report

February 1995

Prepared by: Scott A. Brancolini, Andrew Cullen, Ross Dunbar, Leticia Y. Flores, Sonya Gross, Carole H. Newman, Joel D. Sherman, Maria Stephens

Task Leader: Carole H. Newman

Project Director: Joel D. Sherman

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Prepared for:

Office of Vocational and Adult Education
U.S. Department of Education
400 Maryland Avenue, S.W.
Washington, D.C. 20202

Submitted by:

PELAVIN RESEARCH INSTITUTE
1000 Thomas Jefferson Street, N.W., Suite 400
Washington, D.C. 20007

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SUMMARY OF PUBLIC COMMENTS REGARDING THE REAUTHORIZATION OF VOCATIONAL AND ADULT EDUCATION PROGRAMS

Introduction

In the Federal Register, dated 20 September 1994, the Secretary of Education invited written comments from the public regarding the reauthorization of programs under the Carl D. Perkins Vocational and Applied Technology Education Act; the Adult Education Act; and the National Literacy Act of 1991. Comments were requested by November 4, 1994 to ensure their timeliness for Administration discussions on the reauthorization.

The Secretary's request for comments covered 18 programs funded at approximately $1.5 billion in the fiscal year 1994. The funded programs include Vocational Education Basic State Grants, Tech-Prep Education, Vocational Education Research, Vocational Education Demonstrations, Vocational Education Data Systems, Adult Education State Programs, State Literacy Resource Centers, Literacy Programs for Prisoners, Workplace Literacy Partnerships and the Adult Education National Programs, including the National Institute for Literacy.

The Department of Education (ED) contracted with Pelavin Research Institute to develop a database that organizes and summarizes the written comments on reauthorization and to prepare a report synthesizing these comments. This report presents the results of that synthesis.

The report contains two main parts: an overview section that summarizes the reauthorization comments with representative supporting data and an appendix (not included in this draft report) with complete documentation for the report. A database system and the corresponding documentation are also provided. The overview provides information on the respondents to the Federal Register Notice, the frequency of responses to different topics in the Notice, the cross-tabulation of respondent type with the number of responses to different topics, and summaries of representative and illustrative comments on topic issues receiving substantial comment. The summaries are organized around the five major sections identified in the Notice, as well as a sixth section to cover miscellaneous comments on additional issues that were not presented in the notice. These sections are:

- **General Principles and Issues** involving the restructuring of vocational and adult education programs to achieve the National Education Goals of America 2000 and to promote World-Class Standards for all students;

- **Crosscutting Program Issues;**

- **Issues Related to the Reauthorization of the Perkins Act and Vocational Education Programs;**

- **General Issues Related to the Reauthorization of the Adult Education Act of Adult Education Programs;**

- **Issues Related to the Reauthorization of the National Literacy Act of 1991;**
- **Miscellaneous Comments.**

The appendix contains an annotated codebook and a listing of respondents including respondent type, state and topic area. The codebook contains both frequencies on the number of responses for each issue outlined in the Register, the proportion of respondents by respondent type who responded affirmatively to "yes/no" questions, and the major points of responses to both open-ended questions and additional issues presented by the respondents.

Overview of Comments

The Federal Register Notice elicited written responses from 5,697 respondents on reauthorization of vocational and adult education programs. As shown in Table 1, private citizens were, by far, the largest respondent group, comprising 51.3 percent of total respondents. They were followed by school-level personnel (29.7 percent), university-level personnel (6.0 percent), special program coordinators (4.9 percent), state educational agency or other state government personnel (3.7 percent), district-level personnel (1.7 percent), national associations (0.8 percent), and state associations (0.6 percent). Another 1.3 percent of respondents were coded into the "other" category because these respondents did not fit any of the above respondent categories.

Although responses to the notice came from all of the 50 states, the District of Columbia, and Puerto Rico, the distribution of responses by state was very uneven across the nation.[1] (The distribution of respondents by state is shown in Table 2). Five states (Illinois, Maine, New York, Ohio, Texas) contributed the bulk (31 percent) of all responses, while 36 states produced less than 35 percent of the total number of respondents. The respondent distribution was quite skewed, with a small number of states (15) responsible for the majority (65 percent) of responses.

The majority of respondents targeted their comments on issues related to individual vocational and adult education programs, rather than on general principles and issues pertaining to the National Education Goals or crosscutting program issues. As shown in Table 3, 87.9 percent of the respondents commented on specific individual program issues, but only 9.3 percent commented on general principles or cross-cutting program issues.[2] An exceptional number of responses were received on specific issues related to General Education Development (GED), and Sex Equity/Single Parents/Displaced Homemaker programs.

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[1] Two respondents were residents of Canada and 1 was from Guam. Forty-two respondents did not identify the state in which they resided or their state of residence.

[2] The total number of respondents broken down by topic is a duplicated count, since some respondents commented on more than one topic area. It is therefore higher than the unduplicated count of respondents contained in Table 3.

TABLE 1

Number of Respondents by Respondent Class

Respondent	Number	Percent
Private Citizen	2,925	51.34
School-Level Staff	1,690	29.66
District-Level Staff	97	1.70
Special Program Coordinator	279	4.90
State-Level Staff	210	3.69
National Association Staff	43	0.75
University-Level Staff	342	6.00
State Association Staff	36	0.63
Other	75	1.32
TOTAL	**5,697**	**100.00**

KEY:

Private citizens include students, program participants, parents, and graduates.

School-level staff include teachers, principals, program coordinators, and other school professionals.

District-level staff include superintendents, district coordinators, and municipal or regional planners.

State-level staff include state officers (governors, legislators and their staff), chief state school officers and state educational agency staff (SEA).

Special program coordinators include local-community-parent advocacy groups and other respondents who could be clearly identified as special program coordinators.

Other includes respondents from private-sector companies and those respondents who did not list titles or affiliations.

TABLE 2

Number of Respondents, by State

State	Number	Percent
Alabama	29	0.51
Alaska	16	0.28
Arizona	155	2.72
Arkansas	34	0.60
California	224	3.93
Colorado	22	0.39
Connecticut	84	1.47
District of Columbia	191	3.35
Delaware	109	1.91
Florida	195	3.42
Georgia	41	0.72
Hawaii	90	1.58
Idaho	28	0.49
Illinois	330	5.79
Indiana	120	2.11
Iowa	44	0.77
Kansas	56	0.98
Kentucky	126	2.21
Louisiana	22	0.39
Maine	322	5.65
Maryland	96	1.69
Massachusetts	70	1.23
Michigan	76	1.33
Minnesota	76	1.33

TABLE 2 (Continued)

Number of Respondents, by State

State	Number	Percent
Mississippi	53	0.93
Missouri	83	1.46
Montana	49	0.86
Nebraska	67	1.18
Nevada	55	0.97
New Hampshire	70	1.23
New Jersey	160	2.81
New Mexico	37	0.65
New York	356	6.25
North Carolina	89	1.56
North Dakota	25	0.44
Ohio	417	7.32
Oklahoma	223	3.91
Oregon	104	1.83
Pennsylvania	242	4.25
Puerto Rico	4	0.07
Rhode Island	16	0.28
South Carolina	52	0.91
South Dakota	21	0.37
Tennessee	142	2.49
Texas	342	6.00
Utah	61	1.07
Vermont	16	0.28
Virginia	187	3.28

TABLE 2 (Continued)

Number of Respondents, by State

State	Number	Percent
Washington	94	1.65
West Virginia	53	0.93
Wisconsin	50	0.88
Wyoming	28	0.49
Other or Missing[3]	45	0.79
TOTAL	5,697	100.00

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[3] Two respondents were from Canada and 1 was from Guam. For 42 respondents we were not able to determine the state or place of origin.

TABLE 3

Major Issue Categories: Distribution of Respondents and Responses

Major Category of Question	Respondents		Responses	
	Number	Percent	Number	Percent
General Principles and Issues	363	5.57	1,277	5.86
Crosscutting Issues	243	3.73	920	4.22
Individual Programs of Vocational Education and General Comments on Perkins Act	1,704	26.16	7,806	35.84
Individual Programs of Adult Education and General Comments on Adult Education Act	4,021	61.74	11,597	53.24
Reauthorization of National Literacy Act	75	1.15	75	0.34
Miscellaneous Comments	107	1.64	107	0.49
TOTAL	**6,513**	**100.00**	**21,782**	**100.00**

TABLE 3a

Major Issue Categories: Distribution of Respondents by Respondent Class

	Type of Respondent									
Major Category of Question	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
General Principles and Issues	17	132	14	46	78	13	39	16	8	363
Crosscutting Issues	14	77	16	25	65	10	26	6	4	243
Individual Programs of Vocational Education and General Comments	618	538	45	117	125	32	172	17	40	1,704
Individual Programs of Adult Education and General Comments	2,292	1,180	55	165	89	12	175	18	35	4,021
Reauthorization of National Literacy Act	9	36	4	12	6	2	4	1	1	75
Miscellaneous Comments	8	26	7	14	27	5	13	6	1	107
TOTAL	2,958	1,989	141	379	390	74	429	64	89	6,513

Comments on General Principles and Issues

Three hundred and sixty-three respondents provided 1,277 general comments on the major category of principles and strategies the Department of Education could use to further the attainment of the National Education Goals (Table 3). Over 20 percent of their comments related to questions concerned with connecting Vocational Education, Adult Education, and the School-To-Work Opportunities Act. A smaller proportion of comments addressed the other five strategies for attainment of the National Education Goals: "restructuring vocational and adult education programs, promoting world class standards for all students, connecting vocational and adult education to broader objectives for achieving educational reform, linking the Perkins Act and the Adult Education Act, and coordinating with other Federal programs and initiatives." The number and percent of respondents and responses to the six subcategories of the major category called General Principles and Issues are provided in Table 4.[4]

Restructuring Vocational and Adult Education Programs to Achieve the National Education Goals

One hundred and eighty-four respondents provided 238 comments on the issue of how Vocational and Adult Education programs can best be structured to achieve the National Education Goals (see Table 4). Many respondents argued that integration of academic and vocational education is critical to achieving these goals. Numerous respondents cited the 1993 National Adult Literacy Survey to emphasize the need for a stronger focus on literacy skills in these programs. Raising the technical expertise and proficiency level of workers to compete in the global economy was another reason for restructuring cited by many respondents. Far fewer mentioned the need to enable individuals to exercise the rights and responsibilities of citizenship. Some specific ideas that were mentioned by several respondents include the following.

- "Federal Vocational and Adult Education programs can best be structured to help the Nation achieve the National Education Goals by assuring that the integration of academic and vocational education is mandated in all funded programs. This integration would promote the literacy training of all students and assure that not only training skills are part of these programs, but academic competencies as well."

- "Efforts to restructure vocational and adult education programs to achieve the National Education Goals must address particular problems of out-of-school youth, secondary and adult students with special learning needs while at the same time ensure opportunities for lifelong learning including postsecondary education preparation."

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[4] The number of responses is considerably higher than the number of respondents, since many respondents answered more than one question in each topic area.

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TABLE 4

Subcategories of General Principles and Issues[5]: Number and Percent of Respondents and Responses

	Respondents		Responses	
	Number	Percent	Number	Percent
Restructure: National Education Goals	184	20.31	238	18.64
Promote World-Class Standards	140	15.45	192	15.04
Connect to Broader Objectives for Educational Reform	111	12.25	167	13.08
Link Perkins and Adult Education Act	162	17.88	210	16.44
Coordinate with Other Federal Programs	136	15.01	176	13.78
Connect Vocational Education, Adult Education, and School-To-Work	173	19.09	294	23.02
TOTAL	906	100.00	1,277	100.00

- "To meet the National Education Goals we must empower the local districts to concentrate on programs and systems that attract students because of quality and relevancy to needs and concentrate on secondary programs using contextual styles of instruction."

Promoting World-Class Standards for All Students

One hundred and forty respondents provided 192 comments on the issue of how the Federal Government should develop higher academic and occupational standards in an effort to promote world-class standards for all students. Common themes stressed the importance of relating classroom learning to occupational needs and the need for more local leaders to help create and monitor standards and assessments. The following comments are illustrative of the ideas mentioned by a large number of respondents.

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[5] The figures presented in this table represent duplicated counts of respondents. Respondents may have addressed questions in the Federal Register Notice in more than one issue category.

- "Set aside no more than 1 percent of the Act's appropriation to establish a 'book' of National Skill Standards for the major job categories. To create these standards organize a committee that is made up of Departments of Education, Labor and Vocational Industrial Clubs of America (VICA) personnel to work with the various national associations, like the ASE (automotive) or IEEE (electrical) to organize existing competency requirements currently available from these organizations for better use in education."

- "Continue to require a system of program accountability with identified measures. However, standards for programs should be set by local institutions to ensure ownership and responsibility for the results. The results being a process of continuous improvement. When federal and state standards are set, minimums becomes maximums, and maximums become minimums. Continue to support the development of skill standards to ensure the adequacy and mobility of graduates."

- "The development of the 'Model Indicators of Program Quality for Adult Education Programs' (ED, Office of Vocational and Adult Education, July, 1992) led to extensive conversations concerning program quality in New York state and, we would imagine, across the country. We believe that it and the work done subsequently at the state and local levels provide a valuable framework for the careful examination of program quality and for the development of program improvement plans."

- "World class standards will occur when classrooms are relevant to occupational needs on all levels (elementary, secondary, post-secondary, university) and are accountable for curriculum and instructional needs."

Respondents also suggested several ways to develop assessments that measure student progress toward attaining world-class standards. Suggested methods included developing a "skills resume" as a prerequisite for graduation, which, like an employment resume, would provide a reader with "concrete information about an individual's academic achievements."

A number of respondents commented on how standards established under the Goals 2000: Educate America Act could be coordinated with Vocational and Adult Education and the reauthorization of Elementary and Secondary Education programs. One specific comment stated that "Adult Literacy Programs are crucial to the Education 2000 Goals being achieved. Parents are the most important factor in achieving the goal of children entering school ready to learn."

Connecting Vocational and Adult Education to Broader Objectives for Achieving Educational Reform

One hundred and eleven respondents provided 167 comments on this topic. The vast majority of respondents who addressed the issue supported the idea of greater State, local and school flexibility in service delivery on the condition of increased accountability for results. Many of these respondents stressed the importance of greater flexibility, placing less weight on accountability.

- "One of NASBE's major concerns is the lack of flexibility accorded to states in their use of Perkins and AEA funds. The current program and funding scheme is overly prescriptive and generally ineffective as a mechanism through which to assist states in meeting their respective needs."

- "The 1990 Perkins Act amendments already have instituted accountability changes to focus on 'program improvement'. . . however, some of this attention is misplaced and has resulted in less attention being paid to the progress of individuals."

Respondents provided several suggestions about ways to achieve greater flexibility in the Vocational and Adult Education programs. These included the following suggestions.

- "Authority should be added to Perkins for states to request and receive state level waivers from the Federal level regarding items such as the use of funds, required percentages of set-asides and match, and other items."

- "Provide greater flexibility through waivers or other mechanisms so long as such flexibility has a demonstrated effect of removing impediments to a school-to-work system."

Many of the respondents stated that service delivery systems need to be integrated in order to assure that the services are not duplicated and are delivered in a coherent fashion.

- "Every state has a single board designated by the Federal government. . . that [board] should be the agency given responsibility and whatever Federal money is going to be provided to develop the quality workforce. If they are unable to deliver and meet the standards that are set, then make the Governor of that state the responsible individual to find an agency that can meet those standards."

- "We encourage Congress to allow waivers of restrictive Federal laws and regulations which hamper state and local co-enrollment and services to populations eligible for Federal programs, including the food stamp employment and training program, JOBS, AFDC, JTPA, EDWAA, UI, ESEA, Wagner-Peyser, Pell, etc."

Linking the Perkins Act and the Adult Education Act

One hundred and sixty-two respondents provided 210 comments on linking the Perkins Act and the Adult Education Act. A majority of respondents favored maintaining the Acts as separate components of the educational system, noting that the different scopes and purposes of the two Acts necessitated this separation. While few respondents supported meshing or integrating the programs, the large majority did support linking and coordinating. The following comments illustrate the most common suggestions.

- "The Acts differ enough in the primary purposes to thrive as separate components of the overall system. The reauthorizations of Perkins and Adult Education Acts could further support each other by building common definitions to such terms as 'adult', 'basic skills' and 'literacy'. Further support could be built by sharing important resources, such as shared technology between Perkins and Adult Education."

- "The Perkins Act and the Adult Education Act should not be meshed. These acts create a continuum of services with Adult Basic Education at the beginning of the continuum. Instead of merging these acts together, programs receiving funds need to work together to achieve better coordination of services."

- ". . . these should not be meshed as far as sharing of funds. There should be a greater effort to refer students back and forth between programs dependent upon student needs. The emphasis of these programs should not allow for duplication of services — Perkins is employment-oriented as compared to the wider scope of adult education."

Coordinating with Other Federal Programs and Initiatives

One hundred and thirty-six respondents provided 176 comments on the issue of coordination among the various employment training programs falling under Perkins, Adult Education and other Federal legislation. While many favored some type of coordination among the programs, few supported an integration of services. The following comments illustrate some of the common suggestions and concerns regarding coordination.

- "A coordinating council could be developed to streamline each [workforce training] program and eliminate duplication and disseminate information that would be available to all initiatives to use as each one tries to achieve individual program goals."

- "Reauthorization of Perkins and Adult Education Acts should provide for more improved coordination through willing participants as a part of a team rather than a combining of the two Acts that would force cooperation."

- "The simplest way to make the broad range of federal programs more effective is to establish standard definitions which would cross program and legislative lines."

- "Federal programs must be coordinated through a clear delineation of each Law's purpose. Presently, there is much confusion, which must be clarified within the language of various laws, such as Tech Prep, STWOA, JTPA, and Goals 2000. This confusion will not be alleviated by placing all laws under one administrative branch of state government . . . ."

Few wholly negative responses were recorded with regard to coordination. The following is a typical response opposing coordination with other programs.

- "Coordinating with other Federal programs and initiatives is just not feasible. What works in California just does not work in the Prairie States, and vice versa. Educational priorities and standards may be possible, as goal priorities, coordinately speaking, but methods of attaining these standards can not be rigidly adhered to — every educator knows this."

Connecting Vocational Education, Adult Education, and the School-to-Work Opportunities Act

One hundred and seventy-three respondents provided 294 comments on this topic. A majority of respondents were in favor of revising the Perkins Act and/or Adult Education Act to better complement the School-to-Work Opportunities Act. They recognized that there is a need to have more coordination among the programs, but that they should not be consolidated. They did differ, however, on how these programs should be coordinated. The following comments are illustrative of the responses provided.

- "Merely mandating coordination at the state and local level is not sufficient to overcome the fragmentation and turf issues created by categorical programming, different funding streams, conflicting rules and regulations, inconsistent cost categories, and demographic reporting systems, varying terms and definitions, incompatible performance and evaluation criteria, restrictive eligibility requirements, etc."

- "Perkins should be reauthorized as a separate statute that is integrated with Goals 2000 and the Elementary and Secondary Education Act, which supports the School-to-Work Opportunities Act. The reauthorized Perkins Act should provide program supports and general capacity for the framework of school-to-work programs and activities already supported by Perkins."

- "The Adult Education Act should not be revised to complement the School-to-Work Opportunities Act. The latter act deals with preparing students for the workforce; the former, deals with many adults already in the workforce."

- "I recommend that any changes in the Perkins Act support a full range of student learning opportunities relevant to contemporary workforce needs."

- "The new Perkins Act would give the national leadership so desperately needed and a funding level of $5 billion would place the federal investment where it should be — on strategies that prevent the need for costly and often unsuccessful remediation through second chance programs."

- "Focus federal funds only on those activities and expectations consistent with the School-to-Work Opportunities Act. This would closely align voc-tech activities with comprehensive education reform and the integrated systems developed under Goals 2000 and the National Skills Standards Act of 1994 calling for high expectations for students to meet world class academic and occupational standards."

Comments on Crosscutting Program Issues

Two hundred and forty-three respondents provided 920 responses on the six subcategories outlined in the Federal Register Notice: program standards and assessments, distribution of funds, corrections education, state plans and responsibilities, professional development, and data collection. Table 5 shows both the number of responses and the number of respondents in each of the six subcategories of the major category called Crosscutting Issues.

TABLE 5

Subcategories of Crosscutting Issues[6]: Number and Percent of Respondents and Responses

	Respondents		Responses	
	Number	Percent	Number	Percent
Program Standards and Assessment	105	17.80	189	20.54
Distribution of Funds	134	22.71	212	23.04
Corrections Education	69	11.69	121	13.15
State Plans & Responsibilities	63	10.68	99	10.76
Professional Development	133	22.54	182	19.78
Data Collection	86	14.58	117	12.72
TOTAL	590	100.00	920	100.00

Program Standards and Assessment

One hundred and five respondents provided 189 comments on the subject of developing standards for the evaluation of Vocational and Adult Education, with the majority agreeing that a single national system of standards and assessments should be applied to both programs. There was a minority however, who did not want a 'single' national system, but would opt for a more individualized system of measures, specific to particular acts. Variations in the comments suggested that respondents believe a valid system of assessment can be developed through clear national goals for both programs, designating Federal standards for each independently. This would allow for standards and measures that are consistent with national education goals, while allowing limited flexibility for comparisons between state programs, and a continuity of basic standards for all programs. The following are direct statements by respondents.

- "Clear national standards and measures must be tied to School-to-Work goals, National Education Goals and other national goals."

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[6] The figures presented in this table represent duplicated counts of respondents. Respondents may have addressed questions in the Federal Register Notice in more than one issue category.

- "Realizing the complexities experienced in formulating standards for vocational education alone, it may not be feasible at this time to jointly involve both programs."

- "These [national standards] must be established carefully with allowance for limited flexibility to meet local peculiarities; however, ultimately it would be most feasible to all ensure continuity and basic standards for all programs."

- "These standards and assessments and the use of both in program improvement can be instituted at all levels with enforcement tied to funding. National standards are feasible to validate comparisons between state programs."

- "Standards need to be designed according to local and state needs with the exception of broad standardized Federal standards. The measures and standards need to be broad and simply administered for optimum local cooperation and accuracy."

Distribution of Funds

One hundred and thirty-four respondents provided 212 comments on the distribution of funds to adult and vocational education programs. While there were a number of responses addressing and supporting possible changes in the formula for adult education funding, these responses varied greatly. There was one group of respondents who favored changing the formula to reflect the fact that a majority of clients in ESL courses have a high school diploma or equivalency. Other responses include the following.

- "Cut the bureaucracy and give more funds directly to the suppliers of adult education."

- "Performance, positive student outcomes, as well as other measures of accountability, given enough time for adequate implementation, could serve as indicators for continued funding."

On the issue of vocational education formulas, however, several themes emerged. The following comments illustrate these themes.

- "If a formula is mandated for distribution of funds it must include adequate funding to rural areas, which, while sparsely populated, contain pockets of poverty and educational disadvantages. Rural school districts and postsecondary institutions serving large rural areas face challenges to educational improvement not envisioned by the Carl Perkins formula. At the very least a rural equalization factor must be applied or special grants be made."

- "One dilemma that needs to be addressed is the funding formula which is based on the number of Pell grant recipients. This formula has not proven to be an equitable representation of the needs of colleges and universities for vocational programs."

- "In addition to formulas based on population, years of schooling, and income, the criteria must include the literacy rate of the individual school districts and the job market requirements and predictions. Innovations and achievement should be rewarded with extra funding."

Another topic receiving great attention was the issue of state and local flexibility with regard to funding allocation. A majority of respondents strongly supported state and local flexibility in the use of federal funds. The following statements illustrate these views.

- "Educational needs can best be met by distribution of funding administered at the state level since program offerings must be tailored to fit highly individualized situations that vary greatly from one locality to another."

- "The ultimate successes of both the Carl Perkins Act and the Adult Education Act depends on the extent of flexibility local providers have to use funds to meet the educational needs of adults. Distribution of funds must allow for this flexibility."

Corrections Education

Sixty-nine respondents provided 121 comments on the issue of corrections education. Response was evenly divided with regard to the effectiveness of current corrections education programs under the Perkins, Adult Education, and National Literacy Acts. The opposing viewpoints are summarized in the following quotes.

- "These three separate authorities are effective, within the limits of available resources, in meeting the vocational and adult education needs of incarcerated individuals."

- "Currently correction education programs are eligible to receive funding from a wide variety of Federal legislation. The rules and regulations that govern the operation of this legislation are often inappropriate for institutional programs and have contradictory or conflicting requirements."

A large percentage of the responses addressing the integration of the programs favored combining the services of the three Acts to form a more cohesive and comprehensive program. The minority who opposed integration warned of the loss of current benefits under such a plan. These opinions are expressed below.

- "Perhaps it is time to end funding to correctional education efforts as an add-on and establish a unified correctional education program as an amendment to either the Perkins or Adult Education Acts."

- "The multiplicity and diversity of corrections facilities' capacity nationally merits a more focused approach to incarcerated youth and adult education issues rather than relying on a patchwork of program authority and funding from different pieces of federal legislation with significant variance in program purpose."

- "Such adjustments should not include scrapping the system and starting all over with a comprehensive program. The risk of losing the benefits that programs under those acts bring to our students is too great to warrant complete overhaul."

An overwhelming majority supported continuation of the set-asides for corrections education. Many respondents further suggested that the set-aside under Perkins be increased. One common suggestion was to raise the set-aside from one to five percent.

State Plans and Responsibilities

Sixty-three respondents provided 99 comments on the issue of state plans and responsibilities. Twenty-six respondents stated that some parts of state organizational responsibilities under the Adult Education or the Perkins Act were burdensome. Numerous suggestions were given on how provisions in the Acts could be modified to reduce the burden. The most common themes included cutting all unnecessary bureaucracy and duplication of administrative tasks, and simplifying and consolidating reporting requirements. The following quotes are representative of these ideas.

- "Begin talking the same language when it comes to definitions, outcomes, measurement. Why should federal reporting requirements differ with every single source of funds?"
- "Incentives to states to keep their plan as bureaucratically simple as possible should be implemented...Usually the simplest plans work most efficiently."

An overwhelming majority of respondents supported the position that provisions of the Acts should be modified to link better with other Federal education planning requirements to encourage comprehensive state plans. The following quote is representative of the feeling of a majority of respondents.

- "To encourage comprehensive state plans under Perkins, state plans need to be developed in congruence with Goals 2000 and STWOA, not in isolation to them."

Professional Development

One hundred and thirty-three respondents provided 182 comments on the issue of professional development. Numerous respondents cited a need for additional funding to hire more full-time adult educators, as opposed to the current mixed-bag of full-time, part-time, and volunteer instructors. The need for standards and credentials for adult teacher competency was also mentioned. The following three quotes are representative of the responses on this issue.

- "Additional funds are needed to employ a more professional workforce and for the development of professional, full-time instructors."
- "Additional funding should be provided to the state departments of education for the training of all adult education teachers as well as for the hiring of more full-time instructional personnel."

- "The reauthorization should include a major initiative in the area of teacher credentializing including the identification of teacher competencies and core courses that are standardized nationally and specifically address the special needs of our adults with learning disabilities, social and psychological barriers to lifelong learning. There needs to be a transition of adult education services from part-time, mostly K-12 teacher certified staff, to full-time, professionally trained staff nationwide complete with nationally recognized standards."

With regard to vocational education, many respondents argued for increased funding to attract, retain, and train top-notch candidates for teaching positions. Additional ideas that were offered as possible ways to achieve this objective included the following.

- "The most important element to the success of vocational-technical education is a strong and well-funded system of professional development to recruit and train prospective educators, with an emphasis on minority recruitment, and to develop the knowledge and professionalism of existing vocational-technical personnel. High standards for teachers cannot be met unless a strong investment is made in their initial and continuing training."

- "To ensure that the skills of vocational teachers remain 'cutting edge,' Perkins must require continuing education for all vocational teachers, including paid summer work in their fields. To recruit summer employers, tax credits or other incentives might be offered to business and industry."

- "Unless specific funds are designated for professional development, this will be the first money allocated to other areas when operational dollars are in short supply."

- "...[I]t is vital that [secondary and postsecondary instructors, counselors, and administrators] complete periodic, professional development experiences in the workplace, including but not limited to: internships, shadowing experiences, practice, or clinical experiences. Where possible, these experiences should be associated with the provision of continuing certification...all eligible recipients receiving funds under the Perkins or Adult Education Acts should have locally developed, comprehensive, systematic professional development plans as part of their local application for funding. Federal discretionary funds should...emphasize collaboration between local STW partnerships and colleges and universities to insure that both in service and preservice professional development priorities are addressed. Support should also be provided for the development of national certification and teaching standards...."

- "Our status [vocational teachers] within the school is someplace above the paint on the wall and below the janitors. We are the last place the administrators want to spend the money generated by us."

Data Collection

Eighty-six respondents provided 117 comments on the issue of data collection. Forty-four respondents commented on whether or not the Federal government should be involved in local data measurements to ensure more consistent and accurate data collection measurements. The vast majority favored Federal involvement. The following is an example from the dominant opinion.

- "The Federal Government should develop and implement a uniform and standardized data collection system for vocational education programs. The data collection system should only collect data that is essential, meaningful, and necessary for program assessment and improvement purposes as defined at the federal level. Existing nationally informed data should be utilized in the data collection system."

Respondents suggested several ways for the Federal government to be involved in data collection to produce meaningful and accurate information. The following comments represent several of the ideas generated.

- "Microcomputers, now readily available in most schools and adult literacy centers, can be used to easily and unobtrusively collect information on diskette. Pre-programmed diskettes could be aggregated at the institution, district, or state level for evaluative, accountability, [and] reporting purposes."

- "For purposes of program review, we recommend annual sampling of a relatively small number of programs in a variety of geographic locations across the country. We have a few recommendations concerning essential program data for such federal review, number of adults in need by service area; number of adults enrolled (absolute and as a percent of projections); profile of student characteristics (age, sex, employment status, ethnicity); number of participant hours; number of credentials obtained ... In addition, the Department should expect to receive comprehensive narrative summaries of program operations - including detailed descriptions of the patterns of proficiency possessed by students upon entry and exit from the program. The use of case studies might be especially helpful."

- "For data collection to be useful and meaningful, the collection process must be at the state level, with common definitions and procedures developed at the federal level."

Issues Related to Individual Vocational Education Programs and General Comments on the Reauthorization of the Perkins Vocational and Applied Technology Education Act

One thousand seven hundred and four respondents commented on issues related to vocational education. These letters contained 7,806 comments on thirty-one topics. Table 6 shows the number of responses and respondents to each of these particular subcategories. The vast majority of responses to issues relating to vocational education were from private citizens (618) and school level staff (538).

The subcategories that received the most attention were (1) sex equity and single parent programs; and (2) tech prep education (see Table 6). These topics drew 5,138 and 699 responses, respectively. The remaining responses discussed issues ranging from program focus to funding sources, program accountability, and targeting for various special populations. The following discussion summarizes the issues mentioned above, as well as several others of particular interest to the public and/or the Department of Education.

An additional 150 respondents expressed general support for the reauthorization of the Carl D. Perkins Act or one of its particular facets. The program that was mentioned by respondents most often was tech prep education.

Basic State Grants: Vocational Education and Applied Technical Programs

There were 15 topics related to Basic State Grants under the Perkins Act in the Federal Register Notice. Sex equity and single parents programs received the greatest number of respondents, while the remaining topics received a fairly equal number.

Program Focus

One hundred and twenty respondents provided 137 comments regarding the issue of Program Focus. While the respondents were divided about whether the past two reauthorizations have achieved their goals, a portion of this difference is due to semantics. Some responses took the past tense structure of the question literally, and the objectives as finite, achievable goals, while others saw the goals as an ongoing process that could not simply be achieved and forgotten about. A third group believed that the emphases were necessary for special populations, but care should be taken to improve programs for all students. If the Federal Register had asked if the past two reauthorizations were successful tools towards obtaining their stated goals, a larger majority would have consented. The following quote illustrates the view that past reauthorizations have, through an ongoing process, achieved long-term goals.

- "Given the long time required to change educational institutions, the amount of interest in these changes has been quite remarkable. . . .Even if the changes have been slow and uneven, there has been substantial progress."

While a majority of responses favored retaining the past Act's emphases, there was a minority which argued that they should be changed.

- "The present targeting process seems to have had a negative effect, as detailed in the NAVE study."

A large majority of responses supported an expansion or revision of the current set of objectives for Vocational Education. The following quotations are illustrative of these comments.

TABLE 6

Subcategories of Vocational Education and Applied Technical Act and Programs[7]: Number and Percent of Respondents and Responses

	Respondents		Responses	
	Number	Percent	Number	Percent
Program Focus	120	4.31	137	1.76
Secondary & Postsecondary Education	88	3.16	146	1.87
Discretionary Grant Competitions	32	1.15	45	0.58
Role of States	47	1.69	85	1.09
Targeting Funds for Special Populations	208	7.47	268	3.43
Criteria for Special Population Services	102	3.66	186	2.38
State Plans	30	1.08	45	0.45
State Council on Vocational Education	53	1.90	99	1.27
Program Accountability	71	2.55	154	1.97
Skill Standards	47	1.69	77	0.99
Coherent Sequence of Courses	51	1.83	66	0.85
All Aspects of Industry	37	1.33	46	0.59
Employer Interest & Involvement	82	2.94	152	1.95
Sex Equity & Single Parent Programs	1,293	46.43	5,138	65.82
Native American & Hawaiian Native Programs	20	0.72	40	0.51
Tech-Prep Education	198	7.11	699	8.95
Research & Dissemination	39	1.4	69	0.88
Demonstration Programs	29	1.04	45	0.58

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[7] The figures presented in this table represent duplicated counts of respondents. Respondents may have addressed questions in the Federal Register Notice in more than one issue category.

TABLE 6 (Continued)

Subcategories of Vocational Education and Applied Technical Act and Programs: Number and Percent of Respondents and Responses

	Respondents		Responses	
	Number	**Percent**	**Number**	**Percent**
Vocational Education & Occupational Data Systems	42	1.51	77	0.99
Tribally Controlled Postsecondary Vocational Instruction	2	0.07	3	0.04
Unfunded Authorities	44	1.58	78	1.00
Assistance to States	105	3.77	105	1.35
Allotment & Allocation	1	0.04	1	0.01
General Support for Basic State Grants	1	0.04	1	0.01
General Support for Secondary, Postsecondary, & Adult Vocational Education	3	0.11	3	0.04
Community-Based Organizations	1	0.04	1	0.01
Consumer & Homemaking Education	6	0.22	6	0.08
Comprehensive Career Guidance & Counseling Programs	5	0.18	5	0.06
Business-Labor-Education Partnership Training	2	0.07	2	0.03
General Support for Technical Prep Education	24	0.86	25	0.32
General Support for Vocational Education & Occupational Informational Data System	2	0.07	2	0.03
TOTAL	2,785	100.00	7,806	100.00

- "The focus on program improvement needs to be continued and enhanced. Program improvement needs to occur from a statewide perspective, and locally to provide program improvement for all students (not just special populations)."

- "Perkins Act funds currently comprise less than ten percent of funds for the aggregate support of secondary and postsecondary occupational programs nationwide. Such funds, therefore should be directed toward innovation and transformation strategies at this time when the nature of work and the workplace is changing so rapidly with dynamic technical advances."

The most common issue discussed was not explicitly solicited in the Federal Register Notice: the conclusions of the NAVE report to Congress. Most responses accepted the findings of NAVE, but a vocal minority discussed errors that, they believe, undermine the study's results. The following two sample comments reflect these two views.

- "NAVE is an excellent piece of research that you can use that will substantially improve education's ability to prepare students for more education or for high-skill, high wage jobs."

- "NAVE report treats special populations as one gigantic homogeneous group. To claim that individuals with disabilities, economic disadvantagement, cultural disadvantagement, limited English proficiency, current/former adjudicated individuals and women in non-traditional occupations are one big undifferentiated lump defies common sense as well as proper research design."

Secondary and Postsecondary Education

Eighty-eight respondents provided 146 comments on restructuring the Perkins Act. Over half the respondents expressed support for improvement of secondary and postsecondary programs and services.

The large majority of respondents supported restructuring the Perkins Act to support program improvement at the high school level, especially with regard to the integration of academic and vocational education. The following comments illustrate this view.

- "It is recommended that a greater emphasis be given to assist secondary education in the integration of academic and vocational education and to support articulation and concurrent enrollment efforts between secondary education and community colleges that offer major programs in Vocational/Applied Technology areas."

- "The Perkins Act must be focused on secondary education that is articulated above and below grade levels that can lead to the baccalaureate level but has numerous productive exit points. That is the essence of Tech Prep which should be the emphasis of all educational dollars. Quality work at the K-12 level eliminates remedial necessities at the post secondary level."

Many respondents commented on the focusing of the Perkins Act on improving postsecondary education. While the majority offered opinions supporting this idea, there was a minority which rejected restructuring in this manner. The two points are summarized in the following quotes.

- "The Perkins reauthorization process should recognize that work force development reform requires continuing support for strengthening the ability of postsecondary institutions to deliver effective occupational education as well as limited term assistance for innovation and partnership-building."

- "Focusing mainly on postsecondary education would be detrimental to the effectiveness of the vocational education program since it would eliminate such vital programs as Tech Prep, applied academics at the secondary level, and school-to-work transition strategies."

A majority of responses stated that the Perkins Act should only support vocational education below the baccalaureate level. However, some did note that cooperation with postsecondary institutions would be beneficial for those students in university transfer programs.

While only a small number of responses addressed the question of a stronger division between secondary and postsecondary services, the overwhelming majority of those responses supported such a division. One respondent noted the "fundamental difference of K-12's 'exploration and foundation' purpose and postsecondary's 'preparation and concentration' purpose."

Role of the States

Forty-seven respondents provided 85 comments on this topic. These responses agreed with making the state role in Vocational Education stronger, with the belief that strong state leadership would be more conducive to program consistency and improvement. The following comments are illustrative of this point.

- "The state role must be strengthened through increases in state administration and leadership funds. . . The expanded role should include the state leadership technical expertise, regulatory assistance, and efficient administration of state, federal, and other resources necessary to enhance the quality and continuous improvement of vocational education in each state."

- ". . . the reauthorization of the Perkins Legislation should increase the support to states for two purposes: a) the provision of technical assistance; b) the development of other state policies and programs consistent with the intent of the Perkins legislation."

- "Current Perkins legislation shifted the funds from the state level to the local level with the assumption that program improvement and leadership would be forthcoming at the local level. This, for the most part, has not been the case. Leadership and program improvement concepts need to be developed and fostered at the state level. Funding needs to be restored to allow the states to regain their leadership role."

Targeting Funds for Special Populations

Two hundred and eight respondents provided 268 comments on the issue of whether the Perkins Act should continue to target funds to special populations. The majority of respondents argued that emphasis should be placed on serving all students, while targeting funds to those program areas with high concentrations of special populations. Responses favored a funding balance for all students, including those with special needs. Thus, targeting resources to special populations must be an integral part of targeting funds to all students. The following quotes are representative of this view.

- "Emphasis on serving all students is the key to bringing special populations into the mainstream."
- "Targeting only special populations will reduce the quality for the general population. Emphasis should be on integration to quality programs guaranteed accessible to all with higher outcomes or competencies emphasized. Mainstreaming special needs students into quality programs serves as a model for mainstreaming these students into the workplace."
- "The Perkins monies have helped our special population students become successful students and our retention has increased over 38 percent. Our only concern now, is that if the Perkins bill is being re-evaluated and rewritten that special populations remain in the forefront."
- "Organizing around federally specified standards and federally defined target populations could be the first step toward limiting services to those populations, abandoning the working poor (who make up a large percentage of the current population)...this does not mean that programs cannot remain flexible and be modified to meet the needs of specific populations or specific program objectives."

Criteria for Special Services to Special Populations

One hundred and two respondents provided 186 comments on the issue of program services for special populations provided through the Perkins Act. A majority felt that equal access to program services for special populations had been achieved through Perkins provisions, and that these services had proven beneficial, while a small minority of respondents disagreed. The following two quotes are representative of the responses on this issue.

- "These services have been very beneficial to special population learners. They offer them the chance to learn in a non-threatening, totally accessible environment."
- "Providing service(s) to special populations should be part of the improvements for educational programs for all students...there is a legal, and moral, obligation to see that special populations have full access to the programs...In the last reauthorization, Congress eliminated most set asides for special populations...This was a giant step backward and should be corrected."

A majority of respondents agreed that prescriptive levels for special populations should now be reduced in exchange for a greater focus on higher outcomes for all students, including special-needs students. An overwhelming majority of respondents agreed that there should be a focus shift to improvement of vocational programs for all students, while there was less agreement on whether supplemental funds for special populations should be provided. The following quote is representative of the ideas respondents concurred with.

- "The objective of Perkins must be to establish high quality occupational preparation programs for all students, with adequate provision for special populations. Supplementary services should be the responsibility of Title I of the ESEA and IDEA."

The following quote illustrates the majority view on providing supplemental funds for special populations.

- "Criteria should be placed in the legislation that requires states to provide equal opportunity for all students. This includes providing supplemental funds for those programs which are underfunded and which have traditionally excluded special populations."

State Council on Vocational Education

Fifty-three respondents provided 99 comments on the State Councils on Vocational Education. Of the 53 respondents, 22 (41%) were from state education agencies or other state government personnel and 16 (30%) were school-based personnel. The vast majority of respondents supported the State Councils and affirmed their role in monitoring the quality of vocational programs and business involvement. Respondents overwhelmingly favored maintaining the independence of the State Councils. Further, the vast majority of respondents urged the continuation of separate funding. The following comments illustrate these points.

- "This Council model is free of agency control and conflict of interest issues. It does not concern itself with approving programs or allocating funds. Its autonomy has proved beneficial in allowing it to work objectively to further the agendas of both education reform and the development of a workforce development system."

- " . . . you don't place the SCOVE under the control of a State HRIC or make the SCOVE dependent on funding from the bureaucracies to which it reviews and suggests policy if you truly want change and improvement in the vocational/technical education systems."

- "Without the SCOVE having the separate funding and charter to exist under Carl D. Perkins the dynamics of change, or lack thereof, would be even more focused on the internal needs and interests of the bureaucracies rather than on the needs of the workforce and of the taxpayer/citizen of Washington State."

A small number of respondents commented on the question regarding the consolidation of the State Councils on Vocational Education with the State Human Resource Councils. A majority of those who responded to this question expressed support for this consolidation. The majority and minority view on this point are presented below.

- "Requiring consolidation of councils with program implementation responsibilities will enhance coordination."

- "State Councils focus on the first chance occupational preparation system, vocational education. The State Human Resource Councils (SHRC) are an artifact of the second chance preparation, JTPA. Given the different missions of JTPA and vocational education, and the political nature of the SHRC, a separate and distinct body should continue for vocational education."

Program Accountability

Seventy-one respondents provided 154 comments on the issue of program accountability. Most respondents agreed that the reauthorization of Perkins should require that states and localities play a greater role in the development and implementation of performance standards and measures. All respondents to this issue agreed that the current Perkins program accountability provisions to improve ineffective programs should be continued. The majority of respondents to this issue felt that States should be allowed to take "corrective action" on programs failing to meet standards as opposed to cutting the funds of those programs that repeatedly fail. Numerous suggestions were provided on how a system with improved evaluation and program measurement could be developed. Of the respondents expressing their views on this question, the following quotes are representative of the themes that emerged.

- "The reauthorization can better emphasize accountability for results by having clear mandates and accompanying mechanisms to assure that these directives are followed."

- "The present program accountability process (core standards and measures) should be continued, but applied to the state's entire vocational delivery system."

- "States have to be held accountable for helping local agencies meet the requirements of the Act and for requiring them to do so when, for one reason or another, they do not. Whether through rewards, sanctions, or both, there must be some way of ensuring that agencies actually do what the Act mandates."

Employer Interest and Involvement

Eighty-two respondents provided 152 comments on the issue of employer interest and involvement in vocational education. An overwhelming majority felt that cooperative education and apprenticeship programs should be strengthened. A large majority also felt that employer involvement through work-based learning experiences should be given emphasis in the Perkins Act. Many suggestions were given on how to strengthen cooperative education and encourage business involvement in occupational education. They included providing more funding for apprenticeship programs and internships, and including business representatives in cooperative efforts. The following quotes are representative of these ideas.

- "Provide for the payment of expenses associated with the delivery of apprenticeship related instruction courses under Title II of the Act for both adult and student apprentices."

- "Internships are integral to the success of any vocational training program. The availability of internships is crucial for this to be a viable avenue to employment."

- "Specifically include business and employer organizations in those sections which define linkages, members of State Committees, demonstration program recipients, Tech-Prep groups, and coordinating groups. For instance, adding employer-focused organizations to Title I B 112, 113, 115, Title III C, D, and E, and part G 1 would result in significant 'real world' input."

Sex Equity and Single Parents Programs

With 1,293 respondents providing 5,138 comments, the Sex Equity and Single Parents category received the second largest amount of responses. Of the 1,293 respondents, the main contributors were private citizens (590), school-level personnel (360), university-level personnel (121), special program coordinators (82), and state education agency or other state government personnel (77). The respondents overwhelmingly recommended a continuation of the set-aside funds, stating that the two set asides are successful and are still needed. Respondents repeatedly emphasized the benefits of the programs. Three major benefits of the set-asides were cited. These included a significant emotional strengthening of the participants' self-confidence or self-esteem; more and better job opportunities; and an increase in participants' expectations about their lives. The following comments exemplify the views of respondents.

- "Throughout my 15 years in higher education, I have personally seen and felt the difference in literally hundreds of women and have had the opportunity to "re-enter life, develop self-esteem, rebuild lives and families, and enter or re-enter the workforce, as productive, goal-oriented, self-supporting individuals who can hold their head up with pride.

- "It is hard to describe the impact of going from feeling helpless and powerless to feeling optimistic, goal-oriented, and eventually self-supporting. I observe this occurring daily, usually within a short period of time."

A substantial number of respondents stated that the set-aside funds provided program participants with a viable, more cost-efficient alternative to welfare/public assistance programs. Some examples of the comments include the following.

- "Programs have provided resources for individuals to actualize their goal of economic self-sufficiency. In Pennsylvania alone during grant year 1993-94, over $1,966,524.00 has been saved by the state because individuals via the single parent programs of Pennsylvania are moving from dependence on government aid to economic sufficiency."

- "Without this training this targeted group shall remain on welfare and be more of an economical burden on the state budget.. Since the primary goal of any legislator is to reduce the budget, any programs that would eliminate a long-term effect on social welfare budget should be favored."

Responses involving the sex equity coordinator position consistently stressed its importance and effectiveness. Several respondents requested more than one sex equity coordinator for each state, as illustrated by the comments below.

- "With the three service centers and the statewide director, it will still take a period of five years for one of us to get once into every school that has a vocational program. In order to give all schools the guidance in equity that they need, and that many desire, every vocational region needs its own gender equity coordinator."

- "Actually in as large a state as Texas we need two coordinators to really monitor program implementation. Lack of travel funds this year has hampered the current coordinator in my opinion. Additionally the relatively low salary and heavy responsibilities has caused frequent turnover in the position. The requirement for this position is not overly prescriptive and is absolutely needed."

Only a small number of respondents commented on the relationship between the set-asides and state priorities. However, most of those who did comment stated that the set-asides agreed with state priorities, or that state priorities should be changed when they disagreed with the set-asides. One respondent states:

- "The AVA does not support our set-asides, just as they did not in 1989. The message we are getting from our state vocational leadership is that if there are no set-asides, there will be no sex equity or single parent/displaced homemaker programs in Mississippi. Apparently, equity is not a priority in Mississippi, but perhaps it should be."

One hundred and fourteen respondents discussed changes to increase sex equity and improve opportunities in vocational education for single parents. The most prevalent change requested of these programs was for an increase in the amount of funding. In addition to this change, several respondents discussed the current age limit in the single parents/displaced homemaker set-aside program. The following two quotes are representative of these comments.

- "Providing for programs that create effective linkages between programs which address the realities that girls will face as adults and those which address the needs of women. Currently I see little support for programs to provide a continuum of services for girls as they become women. Funding/age barriers such as in Section 222 need to be challenged. The opportunities for economic self-sufficiency for a young woman finishing high-school are nil; however most girls' programs end at 18 or younger. Locally, Big Sisters is unable to serve girls over the age of 12 — a highly critical time in her development. Multi-generational programs are needed — programs that will foster breaking the cycle of role expectations because of beliefs parents hold."

- "Rather than eliminating this funding, it is important to look at broadening our mission. Women between the ages of 14-25 have been identified as those most likely to benefit, and I agree they are the ones most likely to be at risk, (teen pregnancy, single parents, high drop-out rate, unemployed and underemployed). However, I often find the older females, 25 to 27 have proved to be the ones committed to completing training and seeking job placement. Perhaps this age group should be added to the targeted population."

Native American and Hawaiian Natives Programs

Twenty respondents provided 40 comments on the Native American and Hawaiian Native Programs. Respondents were of divided opinion when questioned about the programs' effectiveness. The following comment represents a respondent's view that the programs are effective.

- "Since its inception, the NHVEP [Native Hawaiian Vocational Education Project] has seen the enrollment of Native Hawaiians increase dramatically. Between 1988 and 1994, Native Hawaiian enrollment increase from 11.8 to 15.5 percent of total student enrollment. ... During the same period, retention among Native Hawaiian students participating in NHVEP averaged 70 percent, significantly higher than the national average. We believe that helping students adjust to higher education by providing support services and a welcoming environment makes an important difference in their success."

Those respondents expressing dissatisfaction with the programs stressed reasons why the programs should continue. The following comment outlines some of the reasons why the programs need to be more effective.

- "The National Adult Literacy Survey (NALS) released by the Department of Education showed that the average years of schooling attained by American Indian/Alaska Native adults was 11.7 years, more than a year less than white or Asian/Pacific Islander adults, and that Native Adults were more likely than white adults to read at the lowest levels. Additionally, the 1990 Census shows that 46 percent of Indian and Alaska Native people who reside on reservation lands or in Alaska Native villages do not have a high school or a Graduate Equivalency Diploma."

A few respondents discussed revisions to the set-aside programs to make them more effective. The following are some of these comments.

- "From my limited observation (five students), the current set aside programs for Native Americans should be revised to allow an approximate five-year cap to remediate, job train, and job place per individual. My observation is that the guidelines are too slack and people "stagnate" in the system rather than achieve workable goals in a reasonable amount of time."

- "Sex Equity, Single Parents, Native American and Hawaiian Natives Programs have all helped to create the divisive fragmentation of funds and single focus toward a special group, rather than to all students. I feel these students could be more effectively served by dedicated vocational educational funds for all students."

A few respondents answered the question proposing the Department of the Interior's administering of the set-asides. Seventy-five percent of the respondents believed that effectiveness would not increase under Interior management, and the remaining twenty-five percent believed that the effectiveness would increase. The following comment is an example of the dominant opinion.

- "Programs would not be better served by the Department of the Interior. Since this is a separate set-aside, the state office of Adult, Vocational, and Technical education does not administer the funding. We recommend funding be administered by the state office of Adult, Vocational, and Technical Education."

The majority of respondents stated that greater efforts were required to meet the educational needs of Native Americans.

- "Bureau of Indian Affairs-funded schools are not eligible for funds under the current formula despite large numbers of Chapter 1 and IDEA-eligible students, as these schools are not defined as LEAs. Further, BIA-funded schools were unable to access the 'Indian allocation' under the Perkins Act."

- "Our request is that the Administration's bill reauthorizing the Vocational Education Act provision for a stable, recurring funding base for the 56 BIA-funded schools which is at least as generous as that provided to similarly situated public high schools."

Tech-Prep Education

One hundred and ninety-eight respondents provided 699 comments on this topic. Most respondents requested that the Department of Education continue to give categorical support to the program. They felt that Tech Prep is a successful approach to vocational education that needs more time to fully develop its potential.

- "Tech Prep needs an additional five years of categorical funding. While Tech Prep has progressed well, it is still an uphill climb. It hasn't reached the summit yet and still needs an additional push."

- "The major problem everyone has is finding qualified employees. Many schools are still educating as they did in the 1950s and 1960s. Business now needs a different type of employee. Tech Prep, if properly implemented, can and will provide the employees' business needs for the future."

In addition to citing the merits of the program, many responses warned of the dangers of ending the program prematurely. These responses stated that schools and educators are just now becoming familiar with the workings of Tech Prep, and discontinuing this program would add to many educators' belief that federal educational reform programs are short-term measures with no "staying power," which will make it more difficult to begin another program later on.

- "...the Tech Prep portion of the work we are doing must be protected if we are going to continue to move forward. The biggest hurdle I faced with the educators . . . was the idea 'this, too, shall pass.' Please do everything you can at the federal level to avoid proving them right!"

- "...the credibility of a program means more to teachers than the changes they are required to make. There is always a new program that comes along, causing a failure on the part of teachers to move any one particular direction because they know, given time, the tide 'fad' will change."

Worksite learning was recognized as a highly desirable component of a successful Tech Prep program. However, some believe that it may not be a possibility in all areas, particularly rural ones that do not have the industry to support a mandatory worksite component.

- "I would not agree with requiring a work-based learning component for Tech Prep as this is not always possible in all school systems. It should be encouraged, not required."

- "Business cannot absorb all students. [Recommend] 1. planned programs, 2. earned work experience."

Many responses suggested improvements to the Tech Prep program, most of which revolved around increasing its scope to include earlier grades and more curriculum choices, as well as more strongly integrating vocational and academic curricula. A few, however, cautioned against the expansion of the program until the "consistency and responsibilities of the roles of Tech Prep and School-to-Work are better developed and implemented."

Vocational Education and Occupational Information Data Systems

Forty-two respondents provided 77 responses to the issue of Vocational Education and Occupational Information Data Systems. The majority of comments concerning the collecting and disseminating of occupational information on current and future labor market conditions indicated that the current NOICC and SOICC systems were effective in collecting and disseminating occupational information on current and future labor market conditions. However, some respondents expressed concerns about NOICC and SOICCs.

- "NOICC and SOICC services appear to be helpful, however, one of our greatest needs is the identification of valid and reliable employment data, disaggregated in such a fashion that it is useful for program planning. Presently, the system is very weak and the data is always contentious. Consistent categories and definitions must be used across state lines if the data is to be of use."

- "The efforts of the NOICC and its affiliated SOICCs are important to vocational education. I believe that distribution of the information needs to be more timely and effective."

- "These should be coordinated with the state systems to eliminate duplication. Reduce NOICC and SOICC funding and encourage state data collection for Federal use. Get the funding back to local use to help students."

The majority of respondents agreed that the system was useful to educators planning programs on career education. A typical comment follows.

- "The NOICC is generally useful for a broad assessment of labor market conditions by occupation and program. The data are not fully used because of inherent limits in the existing data systems in context of the wants of users."

All comments regarding whether the current system is useful to students in selecting careers were in agreement that the current system was successful.

- "The NOICC/SOICC network has effectively fostered an extensive system of partners that support career information delivery systems in the Nation...available research and development funds for bringing in new information technologies would spur additional development to respond to educational reform and "Re-employment" initiatives as well as the customization of information systems to different user market niches."

Several respondents recommended changes for making the system of labor market projections more effective.

- "Many SOICCs have data systems matching occupational supply and demand for identifying training needs and identifying possible oversupply. A redesigned Micro-Occupational Information System has been completed and will provide automated access for planners of comprehensive information on current employment, future outlook, wages, duties, graduates, training institutions and related data for hundreds of occupations in each state. Some support financially or programmatically the production of long-term state and area occupational projections and all have a computerized inventory of postsecondary programs in their state."

Respondents discussed means of linking NOICC and SOICC to key elements of the Reemployment Act. The following comments are notable suggestions.

- "...the NOICC/SOICC Occupational Information System database is a multi-agency, or interdisciplinary, aspect of information delivery that is related to re-employment initiatives. However, the re-employment legislation, in combination with announced investments in the Labor Market Information (LMI) system, clearly place a work force development emphasis on the Nation's LMI system, broaden the scope of information coverage, and integrate the service delivery of various programs."

- "Almost all SOICCs operate, manage or provide major support to computerized career information counseling systems found in thousands of school systems.

These efficient high technology guidance systems are a major component of the One-Stop-Career Center proposals in many states."

Unfunded Authorities

Forty-four respondents provided 78 comments on the issue of unfunded authorities. Responses favored providing separate funding for career guidance and counseling, business-labor-education partnerships, supplementary state grants for facilities and equipment, and other program improvement activities. A majority of the respondents supported an increased emphasis on career development and counseling services. The following remarks are representative of the responses given in favor of these activities.

- "The career guidance program is the keystone to directing students to meaningful career choices, and must be funded if we are to make a difference in student lives."
- "We suggest that the revised Act make provision for parent and community education about the Act and about vocational education. This should include the dissemination of understandable information about the needs assessment process, standards and measures, the progress of local agencies and of the state in meeting the standards, innovative programs and strategies, roles for parents and other community members and the like."
- "These services are critical to meeting the purpose of the Perkins Act by informing students and parents about program offerings and career opportunities. Parents will be reluctant to have their children enroll in voc-tech education unless they are shown that it offers alternative pathways to higher education and employment. Career awareness should be raised in elementary grades and exposure to career opportunities must begin by the sixth grade...Specific resources through the Perkins Act should be designed for providing comprehensive career guidance counselors for all students."

Issues Related to Individual Adult Education Programs and General Comments on the Reauthorization of the Adult Education Act

With 4,996 respondents and 11,597 responses, the Adult Education section had the largest number of both respondents and responses. The GED Preparation category received a majority of the responses (8,936). The issue with the second highest response rate was Program Focus, followed by English-As-A-Second-Language, Achievement, Technology, Workplace Literacy Partnerships, and Set-Asides. The Basic State Grants subcategory received the second largest number of the respondents (596). Table 7 shows both the number of respondents and the number of responses to questions in each subcategory of the major category called Adult Education Programs.

Reauthorization of the Adult Education Act

Five hundred and ninety-six respondents offered general support for the reauthorization of the Adult Education program without offering specific comment or criticism about the Act (see Table 7). The following two quotations are illustrative of this type of response.

- "It is critical for Adult Basic Education to receive funding to continue the quality of work that encompasses diversity and flexibility to reach out to the learning needs of this population. Adult Basic Education is the foundation for adults to go on to high school completion, job training and further education."

- "During the time this Act has existed, over 10,000 individuals have attained a secondary degree and countless others have benefited by learning to speak English or read [in Delaware]. While the AEA is not a perfect piece of legislation, it does allow states to have the flexibility to create the infrastructure to serve the needs of individuals in the state without high school skills. No other Federal legislation addresses this need."

State Programs

There were nine topics related to State Programs under the Adult Education Act in the Federal Register Notice. GED preparation received the greatest number of respondents. The topic of Program Focus drew the second largest number of respondents, while the remaining topics received a fairly equal number.

Program Focus

Five hundred and seventy-two respondents provided 979 comments on the focus of Adult Education. The majority of respondents supported its reauthorization and concurred with maintaining adult education as a separate program. The following reasons were the most prominent given in favor of an autonomous Adult Education program: Adult education's "second chance" mission to provide services to those out-of-school individuals that for some reason did not have a successful first opportunity and now need basic skills for employment, as opposed to the "first chance" occupational preparation systems; its current flexibility, cost-effectiveness, and affordability; its ability to deliver a full range of services, among them adult basic skills and literacy skills.

An overwhelming majority of responses indicated support for the continuation of services to help students accomplish their goals: to get a secondary credential (High School Diploma or GED), to gain or improve their employment opportunities, or to acquire English language skills. Respondents did not want an umbrella organization to administer programs and services hence, many were opposed to Adult Education being moved to the Community College system. The following statements are illustrative of these themes.

TABLE 7

Subcategories of Adult Education Act and Programs[a]: Number and Percent of Respondents and Responses

	Respondents		Responses	
	Number	Percent	Number	Percent
Program Focus	572	11.45	979	8.44
GED Preparation	3,257	65.19	8,936	77.05
Set-Asides	49	0.98	100	0.86
Special Experimental Demonstration Projects & Teacher Training	51	1.02	104	0.98
English-As-A-Second Language	72	1.44	165	1.42
Achievement	59	1.18	145	1.25
Client Persistence	48	0.96	84	0.72
Technology	77	1.54	102	0.88
Link Adult Education to Other Domestic Initiatives	33	0.66	45	0.39
State Literacy Resource Centers	52	1.04	90	0.78
Discretionary Programs	25	0.50	62	0.53
Workplace Literacy Partnerships	48	0.96	101	0.87
Technical Assistance and Evaluation	15	0.30	17	0.15
National Institute for Literacy	27	0.54	55	0.47
General Support for Basic State Grants	596	11.93	597	5.15
State Literacy Resource Centers	2	0.04	2	0.02
Workplace Literacy Partnerships	3	0.06	3	0.03
National Workforce Literacy Strategies	1	0.02	1	0.01
Education Programs for Commercial Drivers	1	0.02	1	0.01
Adult Migrant Farmworker & Immigrant Education	1	0.02	1	0.01
Adult Literacy Volunteer Training	3	0.06	3	0.03
State Program Analysis: Assistance & Policy Studies	3	0.06	3	0.03
General Support for National Institute for Literacy	1	0.02	1	0.01
TOTAL	4,996	100.00	11,597	100.00

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[a] The figures presented in this table represent duplicated counts of respondents. Respondents may have addressed questions in the Federal Register Notice in more than one issue category.

- "If the reauthorization of the AEA chooses to consolidate programs, fewer adults would receive services....By consolidating the programs, I believe a great deal of the humanism will be lost."

- "The missions and clientele of the Perkins and Adult Education Act are so different that it is difficult to see the wisdom of combining these pieces of legislation. The Perkins is primarily a 'first chance' occupational preparation system with related academic skill (literacy) acquisition supportive of skill development. The Adult Education mission is primarily 'second chance,' providing literacy services to those individuals that for some reason were not successful the first opportunity, or where English is not their first language."

- "Adult Education should continue to serve all adults in need of basic education....to do so, the Adult Education Act must retain its flexibility to serve all adults....Adult Education must continue to be flexible, cost-effective and affordable to adults regardless of their employment status."

- "Although adults come from various backgrounds and with a variety of special needs, the vast majority of students come to the program with focused goals: to get a secondary credential; to gain or improve their employment opportunities; or acquiring English language skills. Regardless of the student's goals, adult education programs provide the necessary educational foundation for people to succeed at home, in the community or in the workplace."

- "Adult education should remain as a separate program serving individuals without a GED, adult literacy students, and adults who need to improve basic skills. Adult education should be the foundation from which other programs can build from."

General Education Development (GED) Preparation

A total of 3,257 respondents submitted 8,936 comments regarding the GED Preparation program. This overwhelming response was due in part to a letter-writing campaign initiated by the GED Testing Service, which resulted in a large mobilization of people personally involved with the GED program who feared that the program may be discontinued. In their comments to the Federal Register Notice many respondents cited a letter sent out by the GED testing service on October 12, 1994, which implied that Department funding for GED Preparation courses may be in jeopardy, potentially undermining the entire program. This letter urged them to respond to the Federal Register Notice to ensure continued Federal support for the GED program. (It should be noted that since the GED is an independent program administered by the GED Testing Service of the American Council on Education, the U.S. Department of Education has no direct authority over the GED program.)

Many of the responses were intensely emotional testimonials to the success of the GED program. The following comments are representative of the support for this program.

- "With education in a crisis in this country today, I cannot understand how the U.S. Department of Education could possibly entertain the idea of discontinuing the emphasis on the GED diploma. The GED provides a vehicle for people to pursue opportunities . . . which would be closed to them if this program were to be eliminated."

- "Last year, in spite of a horrendous sequence of snow storms, a 64 year old father and his 30 year old daughter regularly attended evening [GED] classes together... I sought their permission to have the local newspaper spotlight their story. Initially they agreed. The next day, however, the daughter called to recant her approval. Her in-laws never knew that she didn't graduate high school . . . . I believe that smug innuendoes such as those in the Federal Register . . . only serve to sustain such detrimental attitudes which minimized the achievements of the aforementioned father and daughter . . . .Do not permit the smug closing of alternative doors to success and independence."

As the above responses indicate, comments strongly favored maintaining the GED as a primary focus of Adult Education. Over 3,500 comments stated that the GED was responsible for giving people a "second chance", either at employment opportunities, or higher education, or both. Others mentioned that the GED was responsible for lessening other costs to society. One respondent stated, "For every dollar spent on adult education, we save $4 in welfare, unemployment, aid to dependent children, and prison costs." Other comments on the tangible outcomes of the GED program are represented by the following:

- "As a retired college professor, . . . I object to having to *justify* my GED and that of my peers . . . I know that wherever I've gone I've met persons in the workplace and academia whose road was smoothed by the GED."

- "Detailed analyses. . . indicate that the GED appears to have broad impact and value for Oregonians. . . . this study provides evidence that GED recipients enjoy improved labor market outcomes (better jobs, higher wages and earnings) and increased levels of social participation (voting and following public affairs closely)."

In addition to these measurable effects of the GED program, over 1,500 responses stressed that the attainment of a GED has intangible benefits, such as increased self-esteem for the participant and a renewed sense of the importance of an education for the participants' families, particularly their children and younger siblings.

While most responses dealt with the positive outcomes of the program, some discussed the GED's incidental benefits. These stated that the GED is a widely recognized certification, and that any program that would be used to supplant the GED would take several years to achieve the respect employers currently hold toward the GED. Others suggested that the GED program is what attracts many adult students to adult education in the first place.

Over 1,400 responses defended the quality of GED programs. The vast majority of the responses that addressed the issue argued that the GED is the equivalent of, if not better than, a traditional high school diploma. These responses often claimed that the GED is normed so that 30 percent of high school seniors would be unable to pass the tests, which they feel implies that a

GED is in some ways superior to a traditional diploma. The following comments are typical of those received on this issue.

- "I have seen adults and older teenagers. . . with high school diplomas who could not pass the test if they tried."
- "I teach a college class for Indiana University. Several in my class are GED graduates. They are the best students in the class!"
- "The addition of the essay actually moved the standard higher than in most high schools."

Despite the overwhelming grass-roots support, a number of respondents offered means by which to improve the program. Many of these suggestions were offered as alternatives to discontinuation. These often related to increasing either the restrictions regarding eligibility (setting a minimum age for participation) or the difficulty level of the tests. The following quotations are illustrative of this theme.

- "These standards, or average scores, can be raised if the literacy skills are the issue or concern. More knowledge and skills can easily be added to the GED Program."
- ". . .it might be valid to set a minimum age such as 18 and to require at least one year out of school before taking the test. Such policies should also contain exceptions for special circumstances. . . .Adjusting the [passing] score upwards . . . remains an option should the test's credibility continue to come under attack."
- "I understand some people's concern with the GED. However, I believe it stems from misuse. . . .it should not replace a regular high school curriculum. . . . The GED is for adults, not teenagers."

Set-Asides

Forty-nine respondents provided 100 comments concerning the set-aside provisions of the Adult Education Act. Responses were split as to whether these allocations had been successful in furthering the goals of the Act. A majority felt that the set-asides were ineffective; however, a sizeable minority defended the worthiness of the requirements. The following remarks are illustrative of this trend.

- "Set-asides and special projects money only seem to increase the amount of money wasted on state bureaucracy to manage these funds."
- "Yes, set-aside language does provide a focus to meet specific population and/or program service area needs."

While there was not agreement about the efficacy of the set-asides, responses were in agreement regarding the overly prescriptive nature of the provisions, as is reflected in the following statements.

- "MAACCE would like to emphasize the need for each state to have flexibility in determining the focus of their local programs based on local needs assessments, rather than continuing with overly prescriptive set-asides that may not address local needs."

- "The specific amount that states should spend must be left to the discretion of the individual states, including allocations for academic targets like GED or literacy."

In conjunction with the sentiment that the set-asides are overly prescriptive, most responses concurred that the Gateway Grants should be discontinued.

- "The present requirement. . . created an unnecessary and clearly duplicative administrative structure at the state and local levels with questionable results. Residents of housing should be added to the existing list of special populations that are identified in the Act that states need to consider when developing state plans and knowledgeable personnel of these entities can be specified as required participants in the state planning process."

The most divisive issue concerning the set-asides was the need for a distinction between Adult Basic Education and Adult Secondary Education. A slight majority believed that any distinction would be artificial and detrimental to the success of both programs, particularly Adult Secondary Education. A larger majority also felt that a maximum funding level for high school programs should not be specified.

- ". . .all funds should be fair game for anyone who can utilize them."

- "Because the goal of a secondary diploma is so much on the minds of adults, we recommend that the Department remove any restriction on the spending of funds for that purpose."

- "There should be distinction between the ABE and adult secondary education populations, however states should be given the flexibility to determine the appropriate ratio in their states. Serving the lower skilled (ABE) population takes more time as these learners tend to be in the program longer, are less able to do self-directed study, require more direct instruction, use more materials and tend to drop in and out due to a myriad of personal problems."

- "Since we may ultimately have to deal with helping people improve their educational skills, where those skills are not defined in terms of grade levels but in competencies, the current restriction on spending not more than 20 percent of a Federal grant on programs for earning a secondary credential should be relaxed."

Special Experimental Demonstration Projects and Teacher Training

Fifty-one respondents provided 104 comments on the Special Experimental Demonstration Projects and Teacher Training. The vast majority of respondents thought that the demonstration projects were successful in training educators, although there was some concern about project dissemination. The following comments are representative of the overwhelming support.

- "Through this program, teachers and administrators have been given the funds necessary to develop training manuals, training videos, and to write specific curricula to meet the needs of special populations in their districts. The set-aside program also enhances the development of innovative practices and techniques which directly affect the students in our classrooms."

- "In the State of California, federally funded 353 staff development projects have contributed to the professionalism of adult educators, supported by California's requirement that teachers in accredited adult education programs have appropriate credentials."

A small number of respondents discussed possible alternatives for training educators. One typical suggestion follows.

- "The grants program should be further refined to require states to develop statewide training systems. Such systems should be developed to 'register' or 'credential' a qualified and trained adult education work force. The set aside has been effective in spurring innovation, but needs further development to uniformly qualify adult educators."

Virtually all responses addressing the issue of funding supported the continuation of the set aside. The following comment summarizes this view.

- "The set aside has been effective in spurring innovation, but needs further development to uniformly qualify adult educators."

A number of respondents indicated that states should be required to establish additional means for the dissemination of effective practices. Two typical comments follow.

- "Each state should establish its own mechanism for dissemination and the Federal government should also require national dissemination of exemplary projects developed under the auspices of the 353 set-aside."

- "There appear to be inadequate mechanisms to disseminate demonstration projects to the wider community. The average practitioner or program manager is not aware of the existence of demonstration projects, not to mention what they may be about and how they might be useful."

English-as-a-Second Language

Seventy-two respondents provided 165 comments on English-as-a-Second Language programs. A vast majority of respondents favored strengthening the ESL programs, citing the great need of the limited English proficient population in this country. The following quotes are indicative of this opinion.

- "I do not think the adult ESOL program is structured properly . . . . It is imperative that all adults who want to improve their English language skills be given the opportunity to do so and are allowed equal access to all programs."

- "There is clearly a need to more aggressively meet the needs of the limited English proficient population in the United States."

The majority of respondents addressing the issue of funding supported changing the formula to reflect the needs of the ESL population. The minority who opposed formula changes generally did so on the grounds that continued flexibility was necessary. The following comments reflect the two opinions.

- "We urge you to give serious consideration and planning to a new formula for the funding of Adult Education English-as-a-Second Language programs under the Adult Education Act. Our students run the gamut from the illiterate to holders of doctorate degrees. . . . However, they all have the same basic needs: to learn enough English to hold a job, to provide for their families, and to give their children a future in their adopted land."

- "The funding formula to the states from the federal government should not be changed. Each state should continue to have the flexibility to fund this population as best fits the situation."

A number of specific ideas for improving the formulas were proposed by respondents, including the following suggestions.

- "With minor modifications, Section 372 [of the National Literacy Act] could become a viable way to target additional resources to those states which are highly impacted by large numbers of limited English proficient adults. This would provide relief to those states most severely in need of resources and yet not disturb the limited resources generally available under the state grant program."

- "States highly impacted by immigration should possibly receive supplemental funds for ESL services, according to an additional formula that is based on the percentage of state residents whose English proficiency is limited."

Several of the respondents offered comment on topics not noted in the Federal Register Notice on the value and benefits of a strengthened ESL program. Respondents offered several reasons for improving the ESL program, including the following comments.

- "English language instruction is essential for accomplishment of goal six: 'every adult American will be literate and possess the skills necessary to compete in a global economy and exercise the rights and responsibilities of citizenship.'"

- "The Adult ESL population represents an important resource which can strengthen our national position in an international economy and should be funded accordingly."

- "Immigrant economic growth will be the cornerstone of Dade County's economy as we approach the year 2000."

- "ESL instruction is essential for transitioning adults and out-of-school youth into skills training, employment and further education."

Achievement

Fifty-nine respondents provided 145 comments on the issue of achievement. The majority of responses believed that Adult Education should be shifted to learner outcomes. The following comment represents this dominant opinion.

- "The Adult Education Act should be amended to provide a greater focus on learner outcomes. Learner outcomes specify gains in reading, writing, and math that are appropriate for each learner. Individuals in our program keep daily logs of academic accomplishments and at regular intervals review these logs to determine their level of achievement."

Many respondents offered several ways to measure learner outcomes. An idea stressed consistently was that outcomes should not be measured solely by examinations.

- "There are alternatives — ones that are not so different from the ones being developed in the elementary and secondary schools. They include: critical evaluations of portfolios of student work; rigorous examination; critical evaluations of student projects; case studies of student development."

- "While I support a focus on learner outcomes, I believe that those outcomes should not be limited to test scores. Demonstration of competencies, teacher observation, student self-appraisal, attainment of a credential, and/or advancement into another program should be among the indicators of student progress and success."

Greater differences of opinion occurred concerning national performance indicators. Approximately half of the respondents favored an establishment of national program performance indicators, while a sizable minority did not favor national indicators. This diversity of opinion is reflected in the following comments.

- "National standards are needed for focus on student outcomes. States could have the freedom to develop their own competency based systems yet still adhere to national standards."

- "...standards of achievement must be developed from the grass roots level on up. The National Core Standards should stem from common criteria among the states. Likewise, state criteria should be established by regional stakeholders which include adult education practitioners, client-students, industry, and public/private organizations. This process could take from three to five years."

Respondents also expressed diverse opinion about whether the Department of Education or states should use outcomes in determining resource allocations. The following comments depict the two most prevalent views.

- "The Department, or States, should not use learner outcomes in making resource allocation decisions. In adult basic education there are too many variables affecting learner achievement (beyond the program's control) to base funding allocation on outcomes."

- "It may, in the future, be desirable for the states to use outcomes, in part, to help guide resources to local programs. At this time, we do not believe that the Department or the States have the data or experience necessary to make allocations based on outcomes."

Client Persistence

Forty-eight respondents provided 84 comments on the issue of how adult education programs can attract and retain clients. A majority of respondents stated that there is a need for more service by program directors in the areas of counseling, job assistance, and child care programs. The following is a sample of some of the other suggestions for improvement.

- "Increase funding in the following areas: 1) offer participants more support services; 2) address the needs of learning disabled students more effectively; and 3) provide sufficient instructional resources."

- "Programs likely to have high levels of retention are those which have defined for themselves a clear focus and have engaged considerable time in thinking and rethinking their approaches to curriculum, instruction, and assessment, their philosophy of teaching and learning, and their expectations of excellence from teachers and students alike. Such programs have an understanding of the importance of having full time teachers that can devote themselves to the demands of teaching, preparation, critical reflection and change...sound instructional approaches and support services, there needs to be an analysis of different models of intensity of instruction...Adults returning to school need a number of support services including child care, transportation, counseling and case management...Additionally, workshops that address such issues as budget and financial management, on-the-job and family stresses have proven to be essential ingredients to a successful effort...the creation of full-time positions, supported with appropriate benefits packages."

- "Some Kansas centers offer incentives for students to attend adult education classes. Instructors reported packed classrooms when they raffled off a turkey dinner and all the trimmings; only those students with excellent attendance could participate. Structured classes, perhaps with time-limited modules, are more effective than come-when-you-please individual instruction. Maybe the ideal would be a combination of classes and individual tutoring. Support services are important, but according to our survey, they don't rank as high as we thought."

- "...not having the resources to provide full-time programming which would allow students to meet their needs in a timely manner nor appropriate numbers of counselors and other supportive services for students while attending adult education programming...The Illinois experience has been one of success when good counseling and case management is on-site and non-threatening."

Most respondents stated that provisions need to be changed to allow greater flexibility or incentives to educators. A number of respondents favored changing the provisions. The following is a typical response.

- "At the present time, the Adult Education Act does not offer incentives that programs need in order to provide these services. There is a great need to integrate support services and assist clients/students in reaching their wide range of goals."

Technology

Seventy-seven respondents provided 102 comments on the issue of technology. The vast majority supported the increased use of technology in adult education and adult literacy programs. The following are examples of the majority opinion.

- "Technology lends itself to any educational program. Through the use of modems and computers, education can reach many more people in remote areas. Technology will also allow students to progress at their own pace and meet their own individual goals."
- "Congress must consider allowing the states to use a portion of the state grant for acquisition and implementation of effective technology."
- "Technology eliminates some of the physical barriers that currently impede student access to adult education such as child care and transportation. It is highly effective in reaching adults in rural areas and utilizes a medium that appeals to the intended audience. Technology is highly effective when used as a remedial tool and it is private and non-threatening for adults. Technology also has the tremendous advantage of being available on demand."
- "Encourage and formally require more cross-agency and fund source sharing of computer labs, training, and technology. Make greater use of the network of State Literacy Resource Centers to assist states and local programs in this area ... More full-time instructional sites would also allow greater use of available and developing new technologies."
- "It is not cost effective to limit use of available technology, i.e., computers to targeted populations such as JTPA. To maximize the integration of services, artificial barriers need to be eliminated that restrict the cooperation and collaboration within and among programs and the sharing of resources."

State Literacy Resource Centers

Fifty-two respondents provided 90 comments regarding State Literacy Resource Centers. A majority of respondents affirmed that the State Literacy Resource Centers are effective in meeting the goals of the National Literacy Act. With regard to specific improvements at the federal level, respondents offered the following suggestions.

- "Consideration should be given to better defining the goals of the SLRC's and placing a high priority on these outcomes at the national and state level which would have significant impacts on the adult education delivery system. By focusing the SLRC's activities in a few areas, they may become more effective in assisting the states in meeting the national education goals."

- "I further urge that the role of SLRCs be expanded to allow them to: play a lead role in the development of common definitions, criteria, and standards for accountability and reporting, and in the design of access to services (referral and tracking), includes appropriate alternative assessment protocols; participate in coordinating staff development efforts of service delivery organizations, provide technical assistance and training, and insure access by all organizations to staff development efforts."

Respondents overwhelmingly rejected the channeling of funds through the governor's office (as the law currently requires), offering the following opinions.

- "Funds allotted for state literacy resources centers should not be channeled through State Governors with their political agendas. This money should be channeled through the Superintendent of Schools in each state."

- "In some cases, this has resulted in competing and duplicative adult education and literacy resource center services being offered in a state. These situations diminish the intended impact of all centers and subsequently, the capacity of the state as a whole . . . final responsibility and accountability for the supervision and management of federal SLRC funds needs to rest within an established and persistent institutional base that is knowledgeable and skilled in adult education program and fiscal management."

National Institute for Literacy

Twenty-seven respondents provided 55 comments on this topic. Slightly less than one half of the responses discussed the current statutory language regarding the Institute's activities, with more than half of these stating that the language allowed the Institute to meet the needs it was created to address. A minority believed that the Institute had been too inactive, or that not enough time had elapsed for an evaluation. The following response illustrates the dissenting view.

- "Currently, there is no evidence that the National Institute is serving the purpose for which it was designed. We have yet to see any activities which link state literacy leaders, advocacy on the behalf of local providers or activity as a clearinghouse. The efforts seem limited to interagency linkages which are not being supported by coordination efforts."

A large number of the responses discussed the appropriateness of the currently authorized activities. Again, the majority believed that these activities were adequate, but a vocal minority argued that these activities have had no impact on the clients. The following two quotations exemplify this difference of opinion.

- "The activities are still appropriate because many of them are still not in place."
- "It has not made a difference in the operations of the program and has little or no impact on the most important aspect of the program. . . the client."

Suggestions were offered on how to relate the Institute's activities to the national leadership priorities of the Department of Education to ensure more effective coordination of literacy-related programs. The following comments are illustrative of these suggestions.

- "The Institute can serve to help communication among the members of the Federal interagency group. . . [it] can also serve as a non-partisan convener of representatives from other key organizations and agencies that are involved, or need to become involved, with working on the issues."
- "[Literacy] needs to be clearly defined, and must be consistent throughout all Federal and state legislative initiatives. The purpose of the Institute, ". . .to enhance the national effort to eliminate the problem of illiteracy by the year 2000. . .", is inappropriate and unrealistic. The purpose needs to be reasonable and obtainable."

Respondents unanimously favored the reauthorization of the National Literacy Act of 1991. The concurring sentiment among respondents was that the Act has allowed many individuals to gain basic reading and writing skills to provide them with greater academic and professional opportunities.

Miscellaneous Comments

One hundred and seven respondents provided comments that could not be placed into any of the preceding categories as shown in Table 3. While these comments vary greatly in terms of specific topics, there are general commonalities linking them together. Many suggested expanding funding under the Acts either in order to serve populations that currently are neglected, or to improve already existing services. Others offered specific suggestions for improvements that were not covered in the Federal Register Notice. The following comments are representative of these trends.

- "Clearly, there is a significant overlap between the populations served by the chemical dependency treatment and criminal justice systems. However, there are no special provisions in the vocational and adult education acts to provide education and vocational services to persons participating in drug treatment."

- ". . . [The Perkins Act] should include funding for parent education and training, as well as for outreach to other interested segments of the community, such as business."

- "The AVA Board supports Vocational Student Organizations as a key element in quality voc-tech education and essential in meeting the national education goals and skill standards. Their activities should be supported with federal funds and their availability should be expanded to meet the needs of all students."

- "A reauthorized Adult Education Act should include the Adult Education for the Homeless Program, with additional language in the appropriate section establishing a minimum state grant to all states of $150,000. These programs at the state level are almost always administered by the same Bureau or Division that has responsibility for all other federal and state adult education programs."

- "State Adult Education Advisory Committees composed of a wide range of committee members, including consumers, employers, adult education specialists, and agencies that make referrals to adult education centers might add credibility to Adult Education and help promote the respect these services deserve."

APPENDIX A

SUPPLEMENTARY TABLES

TABLE A-1

Respondent Class: Distribution of Respondents by State

States	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
Alabama	1	14	5	2		2	5			29
Alaska		8		1	4		2	1		16
Arizona	55	73	2	3	11		11			155
Arkansas	8	18	2		3		3			34
California	97	76	6	13	6		23	1	2	224
Colorado	2	12		2			3		3	22
Connecticut	27	53	2		1				1	84
District of Columbia	150	13		4	3	15	2		4	191
Delaware	79	18	2	5	2		1	2		109
Florida	78	79	15	3	4		13	1	2	195
Georgia	9	18		6	3		4	1		41
Hawaii	23	52		4	3		8			90
Idaho	9	12		1	1	1	3		1	28
Illinois	238	33	7	14	7		26	5		330
Indiana	84	24		3	5		1	1	2	120
Iowa	3	26		4	1		10			44

TABLE A-1 (Continued)

Respondent Class: Distribution of Respondents by State

States	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
Kansas	1	31	1	3	3	1	14		2	56
Kentucky	42	50	6	8	6		9	3	2	126
Louisiana	3	14	1	2	1		1			22
Maine	190	97	4	21	2	1	3	3	1	322
Maryland	58	27		6	1		4			96
Massachusetts	24	29		10	2		1	2	2	70
Michigan	28	36		3	4		4		1	76
Minnesota	16	40		12	3		1	3	1	76
Mississippi	23	15	2	8	1		4			53
Missouri	29	33		3	5		11	1	1	83
Montana	18	22	2	4	2		1			49
Nebraska	23	25		3	1		12		3	67
Nevada	42	2		2	5	1	3			55
New Hampshire	55	8		3	2			2		70
New Jersey	91	39	2	5	9	8	3		3	160
New Mexico	2	17		7	5		5	1		37

TABLE A-1 (Continued)

Respondent Class: Distribution of Respondents by State

States	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
New York	254	71	3	10	6	2	9		1	356
North Carolina	31	33		1	3	1	19		1	89
North Dakota	7	10		2	5		1			25
Ohio	305	85	3	8	5		6	2	3	417
Oklahoma	96	59	3	30	19	3	3	1	9	223
Oregon	62	26		2	3		11			104
Pennsylvania	155	43	4	16	8		14	1	1	242
Puerto Rico		1		2	1					4
Rhode Island		7		1	4		2	2		16
South Carolina	25	21	1		3		2			52
South Dakota		12		5	3		1			21
Tennessee	54	64	4	3	9		7	1		142
Texas	214	73	10	10	4		23		8	342
Utah	30	15	6	2	4		4			61
Vermont	1	7		4	2		1	1		16
Virginia	86	46	1	10	2	8	17		17	187

TABLE A-1 (Continued)

Respondent Class: Distribution of Respondents by State

States	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
Washington	26	38		3	9		16	1	1	94
West Virginia	26	19	2		3		3			53
Wisconsin	10	24		3	7		6			50
Wyoming	1	16	1	1	3		6			28
Other or Missing	34	6		1	1				3	45
TOTAL	2,925	1,690	97	279	210	43	342	36	75	5,697

TABLE A-2

Respondent Class: Distribution of Responses by State

States	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
Alabama	4	59	20	4		7	20			114
Alaska		33		4	46		14	1		98
Arizona	214	326	4	9	101		45			699
Arkansas	19	64	12		15		8			118
California	186	310	62	60	98		240	5	24	985
Colorado	7	58		4			56		14	139
Connecticut	56	179	6		1				3	245
District of Columbia	277	37		8	59	81	6		6	474
Delaware	129	82	9	27	4		8	51		310
Florida	207	364	68	26	154		61	45	10	935
Georgia	20	65		21	51		28			185
Hawaii	54	154		14	58		36			316
Idaho	30	51		2	4	8	13		4	112
Illinois	455	139	25	59	124		107	41		950
Indiana	160	96		7	111		2		8	384
Iowa	4	391		37	5		41			478

TABLE A-2 (Continued)

Respondent Class: Distribution of Responses by State

States	Private Citizen	School Level	District Level	Special Programs	State Level	National Association	University Level	State Association	Other	Total
Kansas	3	89	1	11	26	22	45		6	203
Kentucky	94	231	56	46	63		24	15	8	537
Louisiana	5	48	2	9	83		3			150
Maine	402	330	4	63	5	4	8	4	4	824
Maryland	120	127		38	5		21			311
Massachusetts	51	74		101	15			2	5	248
Michigan	84	143		17	19		39		3	305
Minnesota	58	199		54	33		6	13	8	371
Mississippi	64	53	7	25	5		15			169
Missouri	72	137		11	31		43	15	2	311
Montana	56	76	3	17	89		2			243
Nebraska	46	117		17	8		68		8	264
Nevada	173	13		8	26	6	11			237
New Hampshire	103	23		7	5			6		144
New Jersey	208	155	12	23	50	39	8		8	503
New Mexico	8	67		36	43		13	4		171
New York	814	305	10	114	37	14	144			1,438

TABLE A-2 (Continued)

Respondent Class: Distribution of Responses by State

States	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
North Carolina	73	121			59	6	85		8	352
North Dakota	25	43		10	61		4			143
Ohio	828	340	12	44	179		28	31	9	1471
Oklahoma	333	232	13	117	64	7	11	4	29	810
Oregon	177	128		10	9		50			374
Pennsylvania	545	158	31	83	83		45	27	6	978
Puerto Rico		4		5	5					14
Rhode Island		37		4	99			3		143
South Carolina	53	108	2		256		5			424
South Dakota		76		27	93		1			197
Tennessee	126	244	18	8	23		35	4		458
Texas	341	324	51	30	22		138		35	941
Utah	73	77	65	12	27		14			268
Vermont	4	28		12	13		3	3		63
Virginia	337	174	7	32	8	64	75		49	746
Washington	63	159		24	68		57		2	373
West Virginia	46	138	7		152		25			368

TABLE A-2 (Continued)

Respondent Class: Distribution of Responses by State

States	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
Wisconsin	48	119		7	99		23			296
Wyoming	5	136	2	1	21		21			186
Other or Missing	128	50		7	12				11	208
TOTAL	7,388	7,291	509	1,312	2,727	258	1,755	274	270	21,784

TABLE A-3

Major Issue Categories: Distribution of Responses by Respondent Class

	Type of Respondent									
Major Category of Question	**Private Citizen**	**School Level**	**District Level**	**Special Program**	**State Level**	**National Association**	**University Level**	**State Association**	**Other**	**Total**
General Principles and Issues	37	369	51	122	473	29	138	45	13	1,277
Crosscutting Issues	20	266	41	71	361	24	94	32	11	920
Individual Programs of Vocational Education and General Comments	2,394	2,358	195	494	1,167	156	824	75	145	7,806
Individual Programs of Adult Education and General Comments	4,920	4,236	211	599	693	42	682	115	99	11,597
Reauthorization of National Literacy Act	9	36	4	12	6	2	4	1	1	75
Miscellaneous Comments	8	26	7	14	27	5	13	6	1	107
TOTAL	7,388	7,291	509	1,312	2,727	258	1,755	274	270	21,782

TABLE A-4

Major Issue Categories: Distribution of Respondents by State

States	General Principles and Issues	Crosscutting Issues	Individual Programs of Vocational Education and General Comments	Individual Programs of Adult Education and General Comments	Reauthorization National Literacy Act	Miscellaneous Comments	Total
Alabama	2	2	15	12		1	32
Alaska	4	2	7	10			23
Arizona	11	6	109	45			171
Arkansas	1		9	24		1	35
California	19	15	64	164	1	6	269
Colorado	1	1	10	12		1	25
Connecticut			5	79			84
District of Columbia	6	6	15	173	1	4	205
Delaware	7	6	19	90	2	1	125
Florida	24	18	65	134	2	15	258
Georgia	3	3	6	33		1	46
Hawaii	2	6	59	71		3	141
Idaho	1	1	21	7		1	31

TABLE A-4 (Continued)

Major Issue Categories: Distribution of Respondents by State

States	General Principles and Issues	Crosscutting Issues	Individual Programs of Vocational Education and General Comments	Individual Programs of Adult Education and General Comments	Reauthorization National Literacy Act	Miscellaneous Comments	Total
Illinois	15	12	48	281	3	8	367
Indiana	4	3	7	112	1	2	129
Iowa	16	17	18	22		3	76
Kansas	2	3	15	43	1		64
Kentucky	10	10	38	91	3	5	157
Louisiana	1	1	3	21			26
Maine	54	2	10	307	47	1	421
Maryland	8	8	6	84		1	107
Massachusetts	8	5	7	50		5	75
Michigan	4	3	27	46		2	82
Minnesota	10	4	20	55		2	91
Mississippi	2	2	21	33			58
Missouri	3	2	30	54	1	1	91
Montana	2	3	21	25		1	52

TABLE A-4 (Continued)

Major Issue Categories: Distribution of Respondents by State

States	General Principles and Issues	Crosscutting Issues	Individual Programs of Vocational Education and General Comments	Individual Programs of Adult Education and General Comments	Reauthorization National Literacy Act	Miscellaneous Comments	Total
Nebraska	7	3	14	53		1	78
Nevada	2	1	53	2			58
New Hampshire	8	2	9	58		3	80
New Jersey	3	1	66	96	1		167
New Mexico	2	1	23	14			40
New York	11	8	23	337	2	2	383
North Carolina	4	2	9	79		1	95
North Dakota	5	3	16	11	1	2	38
Ohio	11	5	114	305	1	4	440
Oklahoma	2	1	153	70		1	227
Oregon	2	2	50	54			108
Pennsylvania	10	9	148	96	2	4	269
Puerto Rico			1	3			4
Rhode Island	5	5	6	8		1	25

TABLE A-4 (Continued)

Major Issue Categories: Distribution of Respondents by State

States	General Principles and Issues	Crosscutting Issues	Individual Programs of Vocational Education and General Comments	Individual Programs of Adult Education and General Comments	Reauthorization National Literacy Act	Miscellaneous Comments	Total
South Carolina	4	3	12	42			61
South Dakota	3	4	5	19		1	32
Tennessee	5	1	22	118	2	2	150
Texas	9	3	47	294	1	4	358
Utah	6	10	37	24		2	79
Virginia	18	18	98	92	3	6	235
Vermont	2		5	11			18
Washington	5	4	36	57			102
West Virginia	6	5	13	43			67
Wisconsin	7	6	28	23		5	69
Wyoming	4	3	17	10			34
Other or Missing	2	2	24	24		3	55
TOTAL	363	243	1,704	4,021	75	107	6,513

TABLE A-5

Major Issue Categories: Distribution of Responses by State

States	General Principles and Issues	Crosscutting Issues	Individual Programs of Vocational Education and General Comments	Individual Programs of Adult Education and General Comments	Reauthorization National Literacy Act	Miscellaneous Comments	Total
Alabama	4	5	66	38		1	114
Alaska	7	5	49	37			98
Arizona	54	15	460	170			699
Arkansas	1		36	80		1	118
California	87	62	341	488	1	6	985
Colorado	8	7	73	50		1	139
Connecticut			12	233			245
District of Columbia	25	17	86	341	1	4	474
Delaware	14	21	87	185	2	1	310
Florida	83	61	291	483	2	15	935
Georgia	18	1	15	141		3	316
Hawaii	12	27	153	121			
Idaho	2	1	84	24		1	112
Illinois	46	34	215	644	3	8	950

TABLE A-5 (Continued)

Major Issue Categories: Distribution of Responses by State

States	General Principles and Issues	Crosscutting Issues	Individual Programs of Vocational Education and General Comments	Individual Programs of Adult Education and General Comments	Reauthorization National Literacy Act	Miscellaneous Comments	Total
Indiana	30	14	60	277	1	2	384
Iowa	75	91	236	73		3	478
Kansas	5	8	47	142	1		203
Kentucky	50	52	132	295	3	5	537
Louisiana	13	13	59	65			150
Maine	55	3	37	681	47	1	824
Maryland	13	17	19	261		1	311
Massachusetts	30	15	61	137		5	248
Michigan	18	11	120	154		2	305
Minnesota	40	12	116	201		2	371
Mississippi	4	4	71	90			169
Missouri	19	4	121	165	1	1	311
Montana	11	17	126	88		1	243
Nebraska	30	5	86	142		1	264

TABLE A-5 (Continued)

Major Issue Categories: Distribution of Responses by State

States	General Principles and Issues	Crosscutting Issues	Individual Programs of Vocational Education and General Comments	Individual Programs of Adult Education and General Comments	Reauthorization National Literacy Act	Miscellaneous Comments	Total
Nevada	6	1	220	10			237
New Hampshire	9	2	16	114		3	144
New Jersey	8	1	280	213	1		503
New Mexico	7	6	111	47			171
New York	46	39	109	1,240	2	2	1,438
North Carolina	9	16	35	291		1	352
North Dakota	16	15	76	33	1	2	143
Ohio	51	26	495	894	1	4	1,471
Oklahoma	4	1	638	166		1	810
Oregon	5	3	231	135			374
Pennsylvania	41	24	555	352	2	4	978
Puerto Rico			5	9			14
Rhode Island	24	17	55	46		1	143
South Carolina	30	42	190	162			424

TABLE A-5 (Continued)

Major Issue Categories: Distribution of Responses by State

States	General Principles and Issues	Crosscutting Issues	Individual Programs of Vocational Education and General Comments	Individual Programs of Adult Education and General Comments	Reauthorization National Literacy Act	Miscellaneous Comments	Total
South Dakota	22	16	49	109		1	197
Tennessee	20	4	87	343	2	2	458
Texas	35	17	245	639	1	4	941
Utah	19	20	175	52		2	268
Virginia	33	30	387	287	3	6	746
Vermont	2		17	44			63
Washington	24	13	157	179			373
West Virginia	57	47	92	172			368
Wisconsin	28	21	152	90		5	296
Wyoming	19	21	61	85			186
Other or Missing	8	7	111	79		3	208
TOTAL	1,277	920	7,808	11,597	75	107	21,784

TABLE A-6

Subcategories of General Principles and Issues: Distribution of Respondents by Respondent Class

Question	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
Restructuring to Achieve National Education Goal	10	58	10	20	47	3	21	11	4	184
Promote World-Class Standards	3	48	4	14	45	3	17	3	3	140
Connecting to Broader Objectives for Education Reform	1	37	3	10	37	3	13	5	2	111
Linking Perkins Act and Adult Education Act	10	64	5	15	46	4	14	4		162
Coordinating with Other Fed Programs and Initiatives	2	42	6	13	49	5	14	4	1	136
Connecting Vocational Education, Adult Education & School-To-Work Opportunity Act	4	46	7	18	63	4	24	5	2	173
TOTAL	30	295	35	90	287	22	103	32	12	906

TABLE A-7

Subcategories of General Principles and Issues: Distribution of Responses by Respondent Class

Question	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
Restructuring to Achieve National Education Goal	11	65	14	25	75	4	24	15	5	238
Promote World-Class Standards	5	54	6	21	73	4	23	3	3	192
Connecting to Broader Objectives for Education Reform	1	53	5	16	62	3	18	7	2	167
Linking Perkins Act and Adult Education Act	12	80	6	17	67	4	19	5		210
Coordinating with Other Federal Programs and Initiatives	3	53	7	16	65	6	20	5	1	176
Connecting Vocational Education, Adult Education & School-To-Work Opportunity Act	5	64	13	27	131	8	34	10	2	294
TOTAL	37	369	51	122	473	29	138	45	13	1,277

TABLE A-8

Subcategories of Crosscutting Issues: Distribution of Respondents by Respondent Class

Question	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
Crosscutting Program Issues										
Program Standards and Assessment	1	30	5	14	36	2	11	4	2	105
Distribution of Funds	10	45	11	15	33	3	13	3	1	134
Corrections Education	1	23	1	1	31	1	7	3	1	69
State Plans and Responsibilities	1	20	1	3	28	2	5	2	1	63
Professional Development	3	40	8	13	43	7	15	4		133
Data Collection	2	29	3	8	28	4	8	3	1	86
TOTAL	18	187	29	54	199	19	59	19	6	590

TABLE A-9

Subcategories of Crosscutting Issues: Distribution of Responses by Respondent Class

Question	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
Crosscutting Program Issues										
Program standards and Assessment	1	48	11	23	73	3	21	6	3	189
Distribution of Funds	11	72	13	20	69	3	19	4	1	212
Corrections Education	2	34	1	1	58	1	13	7	4	121
State Plans and Responsibilities	1	23	1	3	56	4	8	2	1	99
Professional Development	3	52	12	14	64	8	21	8		182
Data Collection	2	37	3	10	41	5	12	5	2	117
TOTAL	20	266	41	71	361	24	94	32	11	920

TABLE A-10

Subcategories of Perkins Vocational and Applied Technical Act and Programs: Distribution of Respondents by Respondent Class

Question	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
Issues Related to Individual Programs: Vocational Ed										
#1 Basic State Grnts: Program Focus	2	64	4	5	25	3	14		3	120
#1 Basic State Grnts: Secondary & Postsecondary Ed	2	24	8	6	24	4	17	3		88
#1 Basic State Grnts: Discretionary Grant Competition		13		4	14		1			32
#1 Basic State Grnts: Role of States	2	11	1	3	25	1	4			47
#1 Basic State Grnts: Targeting Funds for Special Pop	3	104	9	17	42	8	22	1	2	208
#1 Basic State Grnts: Criteria Special Pop Services	1	36	6	10	32	4	13			102
#1 Basic State Grnts: State Plans		13	1	3	9	1	3			30
#1 Basic State Grnts: State Council on Vocational Ed		16	1	4	22	3	4	2	1	53
#1 Basic State Grnts: Program Accountability	2	21	4	5	28		8	2	1	71
#1 Basic State Grnts: Skill Standards		9	5	2	21	2	6	2		47

TABLE A-10 (Continued)

Subcategories of Perkins Vocational and Applied Technical Act and Programs: Distribution of Respondents by Respondent Class

Question	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
1 Basic State Grnts: Coherent Sequence of Courses		16	2	4	18	2	8	1		51
#1 Basic State Grnts: All Aspects of Industry		9		6	15	1	6			37
#1 Basic State Grnts: Employer Interest & Involvement	2	23	5	6	28	4	9	2	3	82
#1 Basic State Grnts: Sex Equity & Single Parent Pgms	590	360	18	82	77	18	121	8	19	1,293
#1 Basic State Grnts: Native American & Hawaiian Native Pop	1	5	1	3	6		2	1	1	20
#2 Tech-Prep Education	8	69	14	15	42	3	31	5	11	198
#3 Research and Dissemination		11	1	7	16	1	3			39
#4 Demonstration Programs		13	1	3	8	1	2	1		29
#5 Vocational Ed & Occupational Information Data Systems		14	1	3	17	4	3			42
#6 Tribally Controlled Postsec Vocational Institutions		1			1					2
#7 Unfunded Authorities	1	8	3	3	20	3	3	3		44
Gen Comments:Reauth Perkins Voc & Applied Tech Ed Act										

TABLE A-10 (Continued)

Subcategories of Perkins Vocational and Applied Technical Act and Programs: Distribution of Respondents by Respondent Class

Question	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
Title III: Vocational Education Lighthouse Schools										
Title III: Tribally Controlled Postsec Vocational Inst										
Title IV: Research and Development										
Title IV: Demonstration Programs										
Title IV: Vocational Ed & Occupational Inform Data Sys					1		1			2
Title IV: Bilingual Vocational Training										
TOTAL	633	898	95	198	506	64	310	34	47	2,785

TABLE A-11 (Continued)

Subcategories of Perkins Vocational and Applied Technical Act and Programs: Distribution of Responses by Respondent Class

Question	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
#1 Basic State Grants: Program Accountability	2	30	4	7	92		13	3	3	154
#1 Basic State Grants: Skill Standards		12	8	3	39	2	10	3		77
#1 Basic State Grants: Coherent Sequence of Courses		19	4	6	23	2	11	1		66
#1 Basic State Grants: All Aspects of Industry		10		8	20	1	7			46
#1 Basic State Grants: Employer Interest & Involvement	5	33	6	8	63	9	17	4	7	152
#1 Basic State Grants: Sex Equity & Single Parent Programs	2,329	1,488	57	316	274	82	485	34	73	5,138
#1 Basic State Grants: Native American & Hawaiian Native Pop	1	14	3	6	11		3	1	1	40
#2 Tech-Prep Education	25	289	46	42	121	8	107	13	48	699
#3 Research and Dissemination		12	2	7	37	3	8			69
#4 Demonstration Programs		15	2	3	19	1	4	1		45

TABLE A-11 (Continued)

Subcategories of Perkins Vocational and Applied Technical Act and Programs: Distribution of Responses by Respondent Class

Question	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
Title II:Secondary,Postsec & Adult Vocational Education		3								3
Title III:Community-Based Organizations					1					1
Title III:Consumer and Homemaking Education		2	1		2			1		6
Title III:Comp Career Guidance & Counseling Programs		2					3			5
Title III:Business-Labor-Educ Partnership Training		1					1			2
Title III:Tech-Prep Education	2	10	3		3		6		1	25
Title III:Supplementary State Grants										
Title III:Community Education Employment Centers										
Title III:Vocational Education Lighthouse Schools										

TABLE A-12

Subcategories of Adult Education Act and Programs: Distribution of Respondents by Respondent Class

Question	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
#1 State Programs: Program Focus	324	123	9	40	33	2	23	9	9	572
#1 State Programs: Education Preparation	1,873	984	40	109	61	6	156	4	24	3,257
#1 State Programs: Set-Asides		10	1	6	22		7	2	1	49
#1 State Programs:Spec Experiment Demonstration Project & Technical Train		13	2	5	17	1	9	4		51
#1 State Programs:English-As-A-Second Language	9	34	2	8	14	1	2	2		72
#1 State Programs: Achievement	3	14	2	8	20	1	7	3	1	59
#1 State Programs: Client Persistence	1	12	2	6	17	1	3	5	1	48
#1 State Programs: Technology	5	24	3	10	21	1	7	5	1	77
#1 State Programs:Link Adult Education to Other Domestic Initiative	1	10	1	2	11	1	2	4	1	33
#2 State Literacy Resource Centers	2	12	2	7	21		5	3		52
#3 Discretionary Programs		6	2		11		3	3		25

TABLE A-12 (Continued)

Subcategories of Adult Education Act and Programs: Distribution of Respondents by Respondent Class

Question	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
National Program: State Program Analysis Assistance & Policy Standard		1			1		1			3
National Program: National Institute for Literacy		1								1
TOTAL	2,552	1,435	81	254	300	18	247	62	47	4,996

TABLE A-13 (Continued)

Subcategories of Adult Education Act and Programs: Distribution of Responses by Respondent Class

Question	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
#3 Discretionary Programs		16	3		31		6	6		62
#4 Workplace Literacy Partnerships		39	2	6	36	1	6	6	5	101
#5 Technical Assistance and Evaluation		3		2	10		1	1		17
#6 National Institute for Literacy		6	5	14	20		7	3		55
Basic State Grants	333	161	12	39	17	3	15	12	5	597
State Literacy Resource Centers		1		1						2
Workplace Literacy Partnerships(Natl & State-Administrative Programs)	1	1		1						3
National Workforce Literacy Strategies		1								1
Education Programs for Commercial Drivers		1								1
National Program: Adult Migrant Farmworker & Immigrant Ed		1								1

TABLE A-14

Subcategories of National Literacy Act: Distribution of Respondents

Subcategory of Question	Number	Percent
Family Literacy Public Broadcasting Program	75	100%
TOTAL	**75**	**100%**

TABLE A-15

Subcategories of National Literacy Act: Distribution of Respondents by Respondent Class

Question	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
General Comments Reauthorization of National Literacy Act of 1991	9	36	4	12	6	2	4	1	1	75
TOTAL	9	36	4	12	6	2	4	1	1	75

TABLE A-16

Subcategories of National Literacy Act: Distribution of Responses by Respondent Class

Question	Private Citizen	School Level	District Level	Special Program	State Level	National Association	University Level	State Association	Other	Total
Gen Comments Reauthorization of National Literacy Act of 1991	9	36	4	12	6	2	4	1	1	75
TOTAL	9	36	4	12	6	2	4	1	1	75

APPENDIX B

FEDERAL REGISTER NOTICE

federal register

Tuesday
September 20, 1994

Part II

Department of Education

Office of Vocational and Adult Education

Reauthorization of Vocational and Adult Education Programs; Notice

DEPARTMENT OF EDUCATION

Office of Vocational and Adult Education

Reauthorization of Vocational and Adult Education Programs

AGENCY: Department of Education.

ACTION: Request for public comment on the reauthorization of vocational and adult education programs.

SUMMARY: The Secretary of Education invites written comments from the public regarding the reauthorization of programs under the Carl D. Perkins Vocational and Applied Technology Education Act; the Adult Education Act; and the National Literacy Act of 1991.

DATES: Written comments must be submitted on or before November 4, 1994.

ADDRESSES: Written comments should be addressed to Dr. Augusta Souza Kappner, Assistant Secretary for Vocational and Adult Education, U.S. Department of Education, 600 Independence Avenue, S.W., Room 4090–MES, Washington, D.C. 20202.

FOR FURTHER INFORMATION CONTACT: Sharon Jones, Office of Vocational and Adult Education, 600 Independence Avenue, S.W., Room 4050–MES, Washington, D.C. 20202. Telephone: (202) 205–9241. Individuals who use a telecommunications device for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1–800–877–8339 between 8 a.m. and 8 p.m., Eastern time, Monday through Friday.

SUPPLEMENTARY INFORMATION: The Secretary is requesting public comments on the reauthorization of the Department's Vocational and Adult Education programs, including 18 programs funded at approximately $1.5 billion in fiscal year 1994. The funded programs include: Vocational Education Basic State Grants; Tech-Prep Education; Vocational Education Research; Vocational Education Demonstrations; Vocational Education Data Systems; Adult Education State Programs; State Literacy Resource Centers; Literacy Programs for Prisoners; Workplace Literacy Partnerships; and Adult Education National Programs, including the National Institute for Literacy.

Need for Reauthorization

The statutory authorization for these programs expires on September 30, 1995. In order to contribute in a timely manner to congressional reauthorization discussions, the Secretary is beginning a review of these programs. The Secretary intends to submit to Congress the Department's proposals to reauthorize these programs in early 1995. To ensure an opportunity for public participation, the Secretary invites public comments on the reauthorization.

How the Information Will Be Used

The Department has identified six general issues, listed as follows, around which to initiate reauthorization discussions and is particularly interested in receiving comments on those issues. The Department seeks to develop program initiatives that link vocational and adult education programs to the National Education Goals and to the national effort to enable all students to achieve to challenging academic standards. As such, the reauthorization will build on the Goals 2000: Educate America Act, the School-to-Work Opportunities Act, and the pending Elementary and Secondary Education Act reauthorization, each of which focuses on—providing students with greater opportunities to meet high standards; giving States and localities flexibility in the delivery of services in exchange for accountability for results; and directing Federal resources to communities where they are most needed, in amounts sufficient to make a real difference. The Department will also examine how Federal Vocational and Adult Education programs can be coordinated with other Federal programs, such as the Job Training Partnership Act (JTPA), Higher Education Act student aid programs, and Job Opportunities and Basic Skills Training (JOBS) that address similar purposes and serve similar populations.

The reauthorization process also provides an opportunity for resolution of issues affecting current programs that have arisen through evaluations, audits, program operations, budget deliberations, and previous legislative actions. Thus, the Department, while it will examine new program strategies, also seeks comment on the program-specific issues listed below.

Issues for Public Comment

The Secretary seeks comments and suggestions regarding reauthorization of these programs. Comments are especially invited on the following issues.

General Principles and Issues

1. Restructuring Vocational and Adult Education Programs To Achieve the National Education Goals

Results of recent studies of vocational and adult education reveal that considerable progress must be made in these areas if the Department hopes to achieve the National Education Goals. For example, the National Adult Literacy Survey found that as many as 90 million adults in the United States have serious problems with literacy, and, of those, approximately 40 to 44 million function at the lowest proficiency levels defined by the survey. With the American economy in transition, increasing global challenges to our economic competitiveness, and more jobs requiring a high level of technical expertise, our employment and training systems must produce greater numbers of skilled and adaptable workers than in the past.

How can the Federal Vocational and Adult Education programs best be structured to help the Nation achieve the National Education Goals, particularly the goal of ensuring that every American is literate and possesses the knowledge and skills necessary to compete in a global economy and exercise the rights and responsibilities of citizenship?

2. Promoting World-Class Standards for All Students

A major theme of the Administration's earlier legislative proposals has been creating an expectation for all students to meet challenging academic or occupational skill standards. The Department is now exploring options for making this theme a core principle for the Perkins Act and Adult Education reauthorizations as well. Along these lines, how can these Federal Acts best incorporate systems of standards and implement these standards for all vocational and adult education students, including in-school and out-of-school youth, postsecondary students, adults, and special populations? How can these standards best be coordinated with standards developed under Goals 2000 and the reauthorized Elementary and Secondary Education Act?

3. Connecting Vocational and Adult Education to Broader Objectives for Achieving Education Reform

How can some of the other key themes of the Administration's earlier proposals—such as offering greater State, local, and school flexibility in exchange for accountability for student outcomes (including authorizing waivers of certain statutory and regulatory requirements), encouraging integration of services across categorical programs, and targeting resources more effectively—be incorporated in the Vocational and Adult Education reauthorization?

4. Linking the Perkins Act and the Adult Education Act

Should some aspects of the Perkins Act and the Adult Education Act be meshed? For example, could the reauthorization coordinate resources to create a more coherent system for preparing youth and young adults for further education and employment?

5. Coordinating With Other Federal Programs and Initiatives

In recent reports, the General Accounting Office identified, by its count, over 150 programs with employment training aspects, including several vocational and adult education programs. The GAO reports contend that the programs overlap one another and are poorly coordinated, and that their proliferation makes it difficult for States and localities to forge comprehensive employment training strategies. In light of these findings, how should Federal Vocational and Adult education statutes relate to other Federal programs, such as JTPA, Higher Education Act student aid programs, and the Individuals with Disabilities Education Act, and to pending initiatives such as elementary and secondary education reform, welfare reform, and the Reemployment Act? How can Perkins Act and Adult Education Act resources be better deployed to meet national needs for workforce development?

6. Building Bridges Between Vocational Education, Adult Education, and the School-to-Work Opportunities Act

Should the Perkins Act or the Adult Education Act, or both, be revised to complement the School-to-Work Opportunities Act? If so, how should this be accomplished? What principles and goals would be achieved by this linkage? Should some or all of Perkins Act resources be structured specifically to support the School-to-Work act?

Issues That Cut Across Both Vocational and Adult Education Programs

Program Standards and Assessment

Under existing legislation, States have developed systems of standards for the evaluation of both vocational and adult education. Research suggests that these standards are not widely used for program improvement. How can the reauthorization encourage the use of program standards and assessment to improve the quality of vocational and adult education? How can valid program standards, meaningful assessments, and the use of both in program improvement, be instituted in vocational and adult education at the national, State, and project levels? Is it feasible to develop national standards for either program or core standards that apply to both programs?

Distribution of Funds

Both the Adult Education Act and the Perkins Act include funding formulas that specify how the Department of Education allocates vocational and adult education funds to the States. The adult education formula is based on the number of adults, 16 years of age and above, who are not required to be in school and have not received a high school diploma or its equivalent. The vocational education formula, under the 1990 amendments to the Perkins Act, remains essentially the same as under the original Vocational Education Act of 1963; the two main elements of the formula, a set of population factors and an income factor, have remained unaltered for over 30 years. Neither formula includes incentives for States to develop successful, innovative programs or to increase their financial support for vocational or adult education.

The Department intends to review the current allocation formulas for vocational and adult education programs and seeks comment on how those allocation formulas might be changed or how the distribution of funds might otherwise be improved. For example, what methods of distribution, other than formulas, could be designed? If formulas are retained, what bases, other than population, years of schooling, and income, might be used to allocate Federal funds? What other specific changes are desirable? For example, should the adult education formula be modified to reflect the fact that many clients, particularly those enrolled in English-as-a-Second Language courses, already have earned a high school diploma or its equivalent? To consider the impact on State allocations of the in-school population count? Should the vocational education formula include need-related factors such as the State unemployment rate or dropout rate? In general, should funding allocations to States, under either program, be more targeted?

Corrections Education

The Adult Education Act, the National Literacy Act, and the Perkins Act contain three separate provisions for providing educational services to incarcerated individuals. Section 326 of the Adult Education Act requires a State to reserve at least 10 percent of its adult education allocation to fund education programs for criminal offenders in corrections institutions and other institutionalized individuals. Literacy Programs for Prisoners, section 601 of the National Literacy Act, authorizes discretionary grants to establish and operate programs that reduce recidivism through the improvement of life skills and functional literacy. Under section 102(a)(5) of the Perkins Act, States are required to set aside at least one percent of their allocations for vocational education programs for juvenile and adult criminal offenders.

Are these three separate authorities effective at meeting the vocational and adult education needs of incarcerated individuals? Would this population be served better if these authorities were combined into a comprehensive education program for criminal offenders? If so, should there continue to be a set-aside in the Adult Education Act for institutionalized individuals? If so, should it also address the needs of non-incarcerated criminal offenders, such as parolees and probationers?

State Plans and Responsibilities

Are any aspects of the State organizational and planning responsibilities under the Adult Education Act or the Perkins Act overly burdensome? If so, which provisions of the Acts should be revised or deleted to ease any administrative burden they cause? To encourage comprehensive State plans, should any of the State organizational or planning responsibilities under the Acts be modified to require linkages to other Federal education planning requirements, such as those in Goals 2000, the reauthorized Elementary and Secondary Education Act, and the School-to-Work Opportunities Act?

Professional Development

Both the Adult Education Act and the Perkins Act include provisions for encouraging educators' professional development, but a more comprehensive system of Federal support for professional development may be required. Section 353 of the Adult Education Act requires that at least 15 percent of a State's allocation be reserved for demonstration projects and teacher training activities; at least two-thirds of this reservation must be used to train adult educators. Under the Perkins Act, States and local service recipients are authorized to use Basic grants and Tech-Prep funds for professional development, and the Act also authorizes support for professional development through other, currently unfunded authorities. Despite these provisions, adult education research has found that few instructors are certified adult educators—only 18 percent of full-time staff and 8 percent of part-time staff. According to the recent National Assessment of Vocational Education (NAVE), both secondary and postsecondary vocational teachers have less formal education than academic teachers, while virtually all academic teachers and faculty members have at a least a bachelor's degree, 12 percent of secondary vocational teachers and 15 percent of postsecondary occupational faculty do not.

What steps can the Federal Government take through the reauthorization to ensure that vocational and adult educators possess the knowledge and skills necessary to be effective and teach to high standards? How can resources under the Perkins Act and the Adult Education Act be used to (1) Support professional development strategies that States will develop under the reauthorized Elementary and Secondary Education Act; and (2) ensure that educators learn and apply the principles of the School-to-Work Opportunities Act, so that schools accomplish real integration of academic and vocational skills?

Data Collection

In the course of collecting data for the National Evaluation of Adult Education Programs, the Department's contractor found weaknesses in the information management systems of many local programs. Many programs that participated in the study did not know how many different clients they serve during a year nor the number of students they serve on a given day. In vocational education, NAVE researchers found data inconsistencies across local tech-prep programs, and national data collection efforts in vocational education have long been problem-plagued. Yet, data collections can be extremely important because they can, if properly conducted, yield valuable information on program outcomes and can help drive funding and policy decisions at both the State and Federal levels.

What role can the Federal Government play to ensure that data collection activities in vocational and adult education programs yield meaningful information that can be used to improve programs and, ultimately, benefit the learner?

Issues Related to Individual Programs

Vocational Education

1. Basic State Grants

- Program Focus.

The last two reauthorizations of the vocational education basic grant have emphasized program improvement and achieving equitable access for special populations. Have these emphases produced the desired results of better preparation for, and success in, postsecondary education and the labor market for the target populations? Should the reauthorization address a revised or expanded set of objectives?

- Secondary and Postsecondary Education.

Should the Perkins Act be restructured to focus on assisting in the comprehensive reform and improvement of secondary education, for example by providing resources primarily to encourage the integration of academic and vocational education at the high school level? Alternatively, should the Act focus mainly on the improvement of postsecondary education, especially community college programs? As a related issue, should the Perkins Act continue to support vocational education only below the baccalaureate level? What attention should the Act give to the needs of out-of-school adults and youth, including dropouts?

- Discretionary Grant Competitions.

The final NAVE report recommends that Congress consider using some portion of Basic State Grant funds for competitive grants to States that propose, and show promise of effecting, comprehensive reforms consistent with the goals of the Act. Should the Department adopt this recommendation? More broadly, should the Act be revised to provide incentives for States to undertake comprehensive reform of their vocational education programs? How would these incentives account for the differences in progress States have already made in undertaking reforms?

- Role of the States.

Most observers agree that the 1990 amendments to the Perkins Act deemphasized the role of the States, yet the NAVE Independent Advisory Panel has contended that States hold the key to achieving vocational education reform at "a pace and scale sufficient to affect national workforce quality." Should the next reauthorization establish a stronger State role? For what purpose? Should the current State governance structure in the Act be modified to reinforce the State partnerships developing under the School-to-Work Opportunities Act? How would this be achieved?

- Targeting Funds for Special Populations.

The NAVE reports that individuals with special needs are overenrolled, relative to their presence in the population, in vocational education. Should the Perkins Act continue to target funds to areas with high concentrations of special populations? Should there be more emphasis on serving all students?

- Criteria for Services to Special Populations.

The 1990 Perkins Act amendments greatly increased the amount and specificity of procedural requirements related to provision of services to special populations. Are these provisions ensuring that members of special populations receive equal access to program services? Are the services provided of benefit to special populations? Could the level of prescription be reduced, in exchange for greater attention to higher outcomes for all students, including students with special needs? Are the current provisions and protections for special populations effective at ensuring that they have an equal opportunity to enter and succeed in the full range of high-quality vocational programs? Should the law continue to focus on providing the supplementary and other services that special populations need to succeed in vocational education, or, as the final NAVE report suggested, should it instead focus more on improvement of the vocational programs in which those students participate? If that strategy were carried forward, would other programs such as Title I of the Elementary and Secondary Education Act and the Individuals with Disabilities Education Act be able to provide the supplementary services special populations require?

- State Plans.

The current Perkins Act State planning requirements are some of the most prescriptive found in any Federal education legislation. Can the goals of these planning requirements be met without these controls on State process? Are the existing procedures for development of the plan and the items required to be included in the plan having their desired effect? If not, what changes should the Department consider?

- State Council on Vocational Education.

For over two decades, the Federal Government has funded the activities of State councils to advise on and assist in the development of vocational education programs in the States. While the 1992 JTPA amendments allow the States to consolidate their vocational education councils into broader State Human Resource Investment Councils, most States have continued to operate separate councils for vocational education.

Have the State vocational education councils fulfilled their objective of monitoring quality and ensuring business involvement in the operation of programs in the States? Should they continue to be separately funded, or should their operation be at State discretion? Is maintaining the independence of councils chartered under the Perkins Act important? Does the existence of separate councils for vocational education contribute to a fragmentation of State policymaking within the broader areas of human resource development and employment? Should consolidation with the State Human Resource Councils be required in order to ensure coordination between JTPA and vocational education?

- Program Accountability.

According to the NAVE, most States have gone beyond the accountability requirements established in the 1990 amendments to the Perkins Act, developing fuller arrays of performance measures than required and applying them to all vocational programs, not just those receiving Perkins funds. However, while as of 1991–1992 State agencies had given a high priority to developing performance standards and measures, local implementation had not yet occurred. Have States and localities found the standards and measures useful for improving programs? How have States' experiences implementing these requirements compared to experiences with the accountability requirements under the JTPA? Should the reauthorization encourage States and localities to give more attention to development and implementation of performance standards and measures? If so, how can program performance best be evaluated and measured so as to benefit the grantees, allow for replication of successful projects, and provide meaningful information to the Department and to Congress? Additionally, should federally supported vocational programs, which currently must meet the accountability requirements set forth in the Perkins Act, be aligned with the standards-based reform activities States and localities will undertake under Goals 2000 and the reauthorized Elementary and Secondary Education Act?

Even beyond the standards and measures requirements, the 1990 Perkins amendments greatly increased the Act's focus on accountability, including adding language on "program improvement" to ensure that local grantees, and then States, take action to improve ineffective programs. Is this working? Should it be continued? Should the statute incorporate more incentives for success? How are the incentives and adjustments for special populations working? Should the statute allow States to take "corrective action" or cut funding to programs that repeatedly fail to reach the standards? More broadly, how can the reauthorization better emphasize accountability for results?

- Skill Standards.

Development of occupational and industry skill standards has become an important component of Federal policy. The Goals 2000: Educate America Act establishes a National Skill Standards Board to encourage the creation of a comprehensive system of voluntary skill standards and certification. The School-to-Work Opportunities Act includes, as a basic element of the school-based learning component, high academic and occupational skill standards to be developed under Goals 2000. Previously, the Departments of Education and Labor funded 22 grants to promote the development of skill standards and certification in a variety of industries. How could the reauthorization support the development of voluntary industry skill standards and portable skill certification? How would skill standards and certification of work-related skills affect educators developing curricula and employers seeking skilled workers?

- Coherent Sequence of Courses.

The NAVE found that, in general, secondary vocational programs are not as coherent or rigorous as they should be. They usually lack prerequisites, which maximizes access but reduces chances of aligning vocational courses with each other or with academic courses. In addition, the NAVE reported that most districts, including Title II grant recipients, do not meet the Perkins requirement for a coherent sequence of academic and vocational courses. Should the next reauthorization do more to ensure that more students have the opportunity to take a coherent sequence of academic and vocational courses? If so, how?

- All Aspects of the Industry.

The Perkins Act encourages local recipients to use basic State grant funds to provide vocational education programs that educate students in all aspects of an industry. The NAVE found that, as of the second year of implementation of the 1990 Perkins amendments, the "all aspects" language had only a minor impact on vocational programs. Should the reauthorization continue this area of statutory emphasis? If so, how can it be made more effective?

- Employer Interest and Involvement.

A 1993 survey conducted for the NAVE asked employers about their familiarity and satisfaction with vocational programs. About 60 percent of employers responding to the survey (which had a high non-response rate) said they were familiar with vocational education programs in their local areas. Forty-one percent were familiar with secondary vocational programs, and 47 percent with postsecondary programs. How should the reauthorization encourage business interest and involvement in occupational education? Along these lines, should the reauthorization seek to strengthen cooperative education, and, if so, how? Should employer involvement, through activities such as provision of work-based learning experiences, be given more prominence in the Act? If so, how can the Act increase business involvement, including increased workplace education in vocational and basic skills? What about other federally supported programs, including adult education programs?

- Sex Equity and Single Parents Programs.

The Perkins Act requires States to set aside 10.5 percent of Basic State Grant funds for programs to eliminate sex bias in vocational education and programs for single parents, single pregnant women, and displaced homemakers. Have these provisions worked effectively to eliminate sex bias and provide appropriate opportunities for single parents and displaced homemakers in vocational education? If not, what changes should be made? Do the two set-asides mesh with State priorities or are they overly restrictive? Are the two set-asides still needed?

Current law also requires that each State employ a full-time sex equity coordinator who administers the sex equity and single parents set-aside programs, collects and disseminates data on programs, provides technical assistance to local programs, and carries out other responsibilities. Is this requirement an effective means of ensuring gender-equitable practices in vocational programs? Is it still needed? Is it overly prescriptive?

- Native American and Hawaiian Natives Programs.

Currently, under Basic State Grants, the Department sets aside funds for Native Americans and Native Hawaiians. What role should Perkins play in providing vocational education for these populations? Are the current set-aside programs working effectively, or should they be revised? Would the population served through the program be better served if the program was administered by the Department of the Interior? Should the education needs of Native American youth be addressed through current means, or should greater efforts be made to provide resources for these students as part of more comprehensive systems? If so, how would this work?

2. Tech-Prep Education

Tech-Prep programs have expanded tremendously since their introduction in the mid-1980s. The tech-prep approach is one of the few models for local school-to-work opportunity programs and can be built on by States as they implement statewide school-to-work opportunity systems. However, the NAVE found considerable inconsistency in the quality of these programs and in the extent to which they have incorporated all the program components described in the literature and the legislation. Should the reauthorized Act continue to provide categorical support for Tech-Prep education, or should broader support for School-to-Work Opportunities programs, including other models, be offered? If the Tech-Prep program is continued, how can the Act be amended to improve the quality of local projects? Should the Tech-Prep Education program include a mandatory work-based learning component?

3. Research and Dissemination

What should the role of the Department be in conducting vocational education research, and how should it be conducted? Through a national center or centers, as is currently the case for most of the Federal effort? Through field-initiated research? Through discretionary research projects determined through annual priorities? What should be the role of the Department in disseminating research results, descriptions of effective practices, and other information on vocational education? How can vocational education research and dissemination activities, along with similar activities in other programs and Departments, be structured in order to ensure maximum benefits and the efficient use of resources?

4. Demonstration Programs

The Vocational Education Demonstrations Program authority provides the Department and educational institutions an opportunity to try new approaches to vocational education and to learn about the effectiveness of these approaches. The Department has funded a large number of demonstration projects in a variety of areas. Has the field found these demonstrations useful in obtaining information on effective educational approaches? Should a Federal vocational education demonstrations program authority be continued? If so, what areas of inquiry might be emphasized? How should the demonstration projects conducted under this authority mesh with the newly authorized School-to-Work demonstration projects and other, related Federal demonstration activities?

5. Vocational Education and Occupational Information Data Systems

Currently, under the Perkins Act, the Departments of Education and Labor provide funding for the National Occupational Information Coordinating Committee (NOICC) and its affiliated State Occupational Information Coordinating Committees (SOICCs). The NOICC and the SOICCs assess current and future labor market conditions by assembling and disseminating occupational information. Is the current system useful to educators planning programs and to students selecting careers? If not, what changes should be made? How can the NOICC and SOICCs be linked to key elements of the Reemployment Act, such as One-Stop Career Centers?

6. Tribally Controlled Postsecondary Vocational Institutions

Through this program, the Department provides grants for the operation and improvement of tribally controlled postsecondary vocational institutions. Is the program fulfilling its purposes? Should the program be continued? Would the population served through the program be better served if the program was administered by the Department of the Interior?

7. Unfunded Authorities

Currently, the Perkins Act includes separate funding authorities for career guidance and counseling programs, business-labor-education partnerships, vocational education lighthouse schools, model community education employment centers, supplementary State grants for facilities and equipment, and other program improvement activities. None of these activities is currently funded. Should any of them be continued in the reauthorization? If so, why, and with what revisions? More specifically, how should the reauthorization address the area of career development and counseling?

Adult Education

1. State Programs

- Program Focus.

According to an analysis of 1990 census data, more than 44 million adults, nearly 27 percent of the adult population of the United States have not received a high school diploma or its equivalent. The adult education formula targets this population. Of that population, 39 percent have completed eight or fewer years of education, but 61 percent have finished between nine and twelve years of schooling. Forty-one percent of the target population is 60 years of age or older, while 11 percent fall between 16 and 24 years of age. The variation in these individuals' educational needs and goals can make it difficult and time-consuming for adult educators to design effective instructional strategies for them. An additional complication is the broad statement of purpose contained in section 311 of the Adult Education Act, which focuses, in part, on providing assistance to States "* * * to improve educational opportunities for adults who lack the level of literacy skills requisite to effective citizenship and productive employment. * * *"

Should Adult Education remain as a separate program serving a diverse population of adult learners with diverse needs? As one alternative, should the programs be refocused, for example on work preparation and literacy skills upgrading for adults? How can Federal Adult Education programs best be structured to achieve the current objectives in areas such as workforce preparation, family literacy, and English proficiency? Should program services be organized around target populations (such as dislocated workers or immigrants)? By program objective (such as basic skills or workplace literacy)?

- General Educational Development (GED) Preparation.

Many of the approximately one million adults who enrolled in Adult Secondary Education programs in 1993 had as their goal the attainment of a GED certificate. The value of the GED examination as a measure of academic competence and achievement has attracted increasing attention over the past several years as the percentage of high school certificates awarded through equivalency examinations has increased. In the United States, 475,602 of the 756,645 adults who took the GED in 1993 passed the test. Studies focusing on the skill levels, economic outcomes, and postsecondary education experience of GED holders have yielded inconclusive and sometimes contradictory results. For example, most research on the economic value of the GED shows that it is significantly less valuable than a high school diploma; on the other hand, some evidence indicates that GED recipients have higher incomes than high school dropouts.

Should attainment of a GED diploma continue to be a primary focus of Adult Secondary Education? If not, what credential alternatives are available for adults seeking to complete their secondary education? Should local programs be encouraged to offer courses that allow adults to earn a high school diploma?

- Set-Asides.

By establishing set-asides and targeting the needs of special populations, the Adult Education Act requires States to use their Federal adult education funds to address the educational needs of a diverse population, for example: those in need of basic education services, the limited-English-proficient, incarcerated and otherwise institutionalized individuals, and public housing residents. While each of these groups may have a well-established need for adult education services, the mix of their needs may make it difficult for adult education providers to target limited resources on, and create solutions to, the most pressing problems in adult education.

Do the set-asides (e.g., 10 percent for criminal offenders in corrections education and other institutionalized individuals) required by the Adult Education Act further the purposes of the Act? Are they overly prescriptive? Should the reauthorized program continue to draw a distinction between adult basic education and adult secondary education and specify the maximum amount of funds that may be used for high school equivalency programs? Should the Gateway Grants program be continued?

- Special Experimental Demonstration Projects and Teacher Training.

For many years States have reserved formula grant funds to undertake special projects and to train adult educators. Has this set-aside been an effective means of spurring innovation and ensuring a trained adult education workforce, or should other means of achieving those objectives be considered? If this set-aside is retained, should States be required to establish mechanisms for the dissemination of effective practices?

- English-as-a-Second Language.

The National Evaluation of Adult Education Programs found that enrollments in English-as-a-Second-Language (ESL) courses are outpacing enrollments in Adult Basic Education (ABE) and Adult Secondary Education (ASE); during 1992, approximately 46 percent of all clients served in the Basic State Grants program were enrolled in ESL courses. The study also found that the characteristics of ESL clients vary considerably from those served in ABE and ASE. For example, about 50 percent of new ESL clients had a secondary school diploma or its equivalent, while 89 percent of new ABE/ASE students lacked such a credential.

Given the above findings, is the Adult Education program structured properly to address the English language instruction needs of limited English proficient individuals? If so, should the funding formula be changed, or should a new formula be added, to reflect the characteristics of this population?

- Achievement.

Should the Adult Education Act be amended to provide a greater focus on learner outcomes? What would be appropriate types and measures of learner outcomes? Should the Act prescribe creation of national program performance indicators? Should the Department, or States, use those outcomes in making resource allocation decisions?

- Client Persistence.

Although the amount and type of instruction adult learners need to meet their education goals varies because of their diverse characteristics and abilities, findings from the National Evaluation of Adult Education Programs reveal that about 15 percent of clients who register for adult education programs do not receive any instruction. How can the Federal Government promote the development of adult education programs that both attract and retain clients?

According to the National Evaluation of Adult Education Programs, the employment of at least some full-time staff and the provision of support services are two ways programs can increase client persistence and improve outcomes. However, over 80 percent of adult education instructors work part-time, and, although the vast majority of program directors reported meeting their clients' needs for counseling or job assistance, far fewer were able to meet other important support service needs. For example, 42 percent of female clients and 32 percent of male clients have children under the age of six, but only 43 percent of programs reported meeting their clients' child care needs "somewhat" or "fully." Does the Adult Education Act provide programs with sufficient flexibility or incentive to offer these services?

- Technology.

As demands on adults' time continue to escalate—with more people working longer hours, commuting greater distances, and coping with day care and elder care issues—the traditional, tutorial/classroom-based approach to adult education may not be the best mechanism, in many cases, for attracting and retaining adult education students. Incorporating new technologies into adult literacy programs may be one way to address the time constraints of the adult education student. The Office of Technology Assessment (OTA) found in a 1993 study that technology could help transform the field of adult literacy by, for example, allowing students to proceed at their own pace, customize their studies, and establish a schedule that is compatible with their daily lives. However, OTA also suggested that technology does not play a central role in most adult literacy programs.

Should the Federal Government encourage the use of more technology in adult literacy programs? If so, how can technology of proven effectiveness in enhancing learning be incorporated in cost-effective ways that learners will find beneficial?

- Linking Adult Education to Other Domestic Initiatives.

In recent years, policymakers have begun to turn to adult education services as a means of addressing other societal problems, for example, requiring participation in literacy programs for prison parole, continuation of welfare benefits, or, through Even Start, making adult literacy instruction a component of elementary and secondary education improvement. Should the Adult Education Act continue to address very general purposes, or should it be tied explicitly to national efforts to redevelop poor neighborhoods, end welfare dependency, fight crime, or ensure a smooth integration of new immigrants into American society? If the Adult Education Act is linked to other domestic initiatives, should the Act be revised to reflect the impact that mandatory participation requirements of certain programs, such as JOBS, have on adult education programs?

2. State Literacy Resource Centers

The National Literacy Act created the State Literacy Resource Centers program to stimulate the coordination of literacy services, enhance the capacity of State and local organizations to provide literacy services, and serve as a link between the National Institute for Literacy and service providers to share information and expertise.

Are State Literacy Resource Centers effective at meeting the goals of the Act? What steps, if any, should be taken at the Federal level to improve the effectiveness of the Centers? Should the funds allotted under this program continue to be channeled through State Governors?

3. Discretionary Programs

Current law authorizes several discretionary grant programs. Most of these programs are small and fund a limited number of recipients. Although the purpose of the programs is generally the demonstration of effective strategies for addressing particular issues or problems, funds often support local projects that, while beneficial to the recipients, are not designed in a way to yield lessons for broader use.

What role should Adult Education discretionary programs play in helping the Nation achieve its education goals? Would these resources be more effectively utilized under broader authorities, such as the Adult Education State formula grant program? Do the current programs encourage a piecemeal, rather than comprehensive, approach to adult education reform (with service providers devoting too much attention to applying for and administering separate competitive grants), or do they focus attention where it is needed? If there is a need for Federal demonstration programs, what changes are needed to ensure that they are designed as true demonstrations and serve their purposes effectively? What types of evaluation and reporting ought to be required?

4. Workplace Literacy Partnerships

At current funding levels, the National Workplace Literacy program makes discretionary grants for demonstrations that provide literacy training to meet workplace needs. Since its inception in 1988, this demonstration program has generated important information about effective workplace literacy practices. The program has produced curricula transferable for use by specific types of industries, and a national evaluation, currently underway, will generate additional information about program effectiveness. However, after eight years and 261 grants the continuation of the National Workplace Literacy program, in its current form, may not appreciably add to our base of knowledge in this area.

Should the Federal Government continue to support workplace literacy programs and, if so, in what form? For example, should workplace literacy become a key focus of the Adult Education State Grants program? Or should a separate, reconfigured workplace literacy program be designed?

5. Technical Assistance and Evaluation

Section 383 of the Adult Education Act provides assistance to States in evaluating the status and effectiveness of adult education programs and measuring the extent of adult illiteracy in the Nation. Funds support applied research, development, dissemination, evaluation, and technical assistance activities that show promise of contributing to the improvement and expansion of adult education. How should this authorization be structured to provide Federal leadership activities of maximum benefit to practitioners and policy-makers?

6. National Institute for Literacy

The National Literacy Act created the National Institute for Literacy to provide leadership and coordination on adult literacy issues; improve and expand the adult literacy service delivery system; and enhance the Nation's ability to achieve the National Goal of adult literacy and lifelong learning. The Institute has worked toward accomplishing this mission by, for instance—(1) Establishing a National Adult Literacy and Learning Disabilities Center; (2) supporting State capacity-building initiatives in the areas of interagency accountability and staff development; and (3) working with providers to design and implement a national literacy information and communications system.

Does the current statutory language provide for Institute activities that meet the needs of the literacy field? Are the currently authorized activities still appropriate? How should they relate to the national leadership priorities of the Department (as currently authorized under section 383)? How can the Institute work with the Departments of Education, Labor, and Health and Human Services, which form the interagency group that oversees the Institute, to ensure more effective coordination of literacy-related policy and programs at the Federal level?

Format for Comments. This request for comments is designed to elicit the views of interested parties on how the Department's vocational and adult education programs can be structured to meet the objectives of the reauthorization effort as stated in this notice.

The Secretary requests that each respondent identify his or her role in education and the perspective from which he or she views the educational system—either as a representative of an association, agency, or school (public or private), or as an individual teacher, student, parent, or private citizen.

The Secretary urges each commenter to be specific regarding his or her proposals and to include, if possible, the data requirements, timing, procedures, and actual legislative language that the commenter proposes for the improved or redesigned program.

Programs Under Consideration.

The following is a complete list of programs under the scope of the reauthorization:

Carl D. Perkins Vocational and Applied Technology Education Act

- Title I

Assistance to the States, Allotment and Allocation, State Organizational and Planning Responsibilities

- Title II

Basic State Grants, Other State-Administered programs, Secondary, Postsecondary, and Adult Vocational Education

- Title III

Community-Based Organizations, Consumer and Homemaking Education, Comprehensive Career Guidance and Counseling Programs, Business-Labor-Education Partnership Training, Tech-Prep Education, Supplementary State Grants, Community Education Employment Centers, Vocational Education Lighthouse Schools, Tribally Controlled Postsecondary Vocational Institutions.

- Title IV

Research and Development, Demonstration Programs, Vocational Education and Occupational Information Data Systems, Bilingual Vocational Training.

Adult Education Act

- Basic State Grants
- State Literacy Resource Centers
- National Adult Education Discretionary Program
- Workplace Literacy Partnerships (National and State-Administered Programs)
- National Workforce Literacy Strategies
- Education Programs for Commercial Drivers
- National Programs

Adult Migrant Farmworker and Immigrant Education
Adult Literacy Volunteer Training
State Program Analysis Assistance and Policy Studies
National Institute for Literacy

National Literacy Act of 1991

- Title III

Family Literacy Public Broadcasting Program

- Title VI

Functional Literacy and Life Skills Programs for State and Local Prisoners

Dated: September 13, 1994.

Augusta Souza Kappner,

Assistant Secretary, Office of Vocational and Adult Education

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